Abt Associates of Canada
Social Research Consultants

Project Report

# ACCESS TO TRADES AND PROFESSIONS IN ONTARIO

Prepared for

Cabinet Committee on
Race Relations

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# I

# INTRODUCTION

Immigrants have brought a rich array of skills and experience to Ontario. For many years Ontario industries have benefitted from the skills of journeymen trained outside of Canada to fill the need for highly skilled workers. In some professions, Ontario has experienced a net inflow of qualified individuals.

In recent years, however, the Government of Ontario has received complaints that members of minority and ethnic groups are unable to practice their profession or trade in Ontario because their qualifications have not been recognized. The issue was clearly identified by the 1983 Conference for Visible Minority Women co-sponsored by the Human Rights Commission and the Women's Directorate. The Cabinet Committee on Race Relations has considered the issue and responded by adopting a two phased approach. A first phase (the subject of this report) seeks to identify the nature and extent of the problem. If required, a more in-depth study will examine particular questions raised in the first phase.

Since this is an exploratory study, it seeks to identify issues that may warrant further examination. We have not attempted to pursue detailed examination of an issue or to examine solutions. However we have included in this report some suggestions that have arisen during our study.

This study has relied heavily on the cooperation of a large number of people. Community groups, Ministries of Government, professional organizations, employers and unions have all extended their cooperation. A number of individuals responded to the announcement of the study by contacting us to discuss particular cases. Some provided written commentary and documentation. We acknowledge and extend our thanks to each of the individuals and groups who have assisted this study.

II

# HIGHLIGHTS

## A. BACKGROUND

### 1. Context of the study

The study was established to identify entry requirements for the trades and professions which appear as barriers for those trained outside of Canada and which have a disproportionately negative impact on members of minority or ethnic groups. This report focuses on the nature and extent of the problem. If required, further activities may be undertaken to examine questions raised in this first study.

The results are not representative of all trades and professions or of all immigrant groups in the province. This overview seeks to identify issues worthy of further investigation, not to complete the investigation.

### 2. Human rights considerations

The Ontario Human Rights Code, Part 2 section 10, has clear implications for this project. For example, a profession might establish a requirement for admission that could work to the particular disadvantage of a minority group. If challenged, section 10 requires the profession to show that the requirement is both reasonable and valid and that to grant an exception to the minority group would create undue hardship. The profession might argue hardship on the basis of cost to the profession or of a health or safety risk to citizens.

### 3. Study design

The study relies on three lines of inquiry that were conducted in parallel:

- Interviews of immigrant groups across the province.
- Review of the entry requirements stated in the Act and/or Regulations of professional organizations and trades.
- More detailed analysis of data gathered with the cooperation of three professional organizations whose structure of entry requirements and system of records could provide the information we required.

## B. IMMIGRANTS' PERCEPTIONS ABOUT ACCESS TO TRADES AND PROFESSIONS

### 1. Contacts with the immigrant community

We contacted over 30 immigrant organizations in Hamilton, Kitchener-Waterloo, London, Ottawa and Toronto and met representatives of 24 of those groups. The groups are not representative of all immigrants in Ontario. They represent a range of countries of origin, focussing on relatively large numbers of immigrants and reported difficulties with certification.

### 2. Perceptions about which professions and trades represent entry barriers

Respondents identified a large number of professions that pose barriers. Medicine and teaching were identified as problems by the majority of interviewees, followed by engineering, nursing, law, dentistry and architecture. Relatively few respondents mentioned entry barriers in the trades: those trades

mentioned include auto mechanics, electricians, millwrights, hairdressers, welders and watch makers.

### 3. Perceptions of the nature of entry barriers

Meetings with immigrant groups involved wide ranging discussions. For ease of discussion, we can identify five major barriers:

- **English proficiency.** Most immigrants reported that the requirement for English proficiency was "a tremendous barrier", largely because of the lack of programs and support to assist immigrants in reaching the required level of proficiency.

- **Evaluation of academic credentials.** This presents an entry barrier for a number of reasons including the requirements for original documents (a particularly difficult problem for refugees), and a perception that foreign credentials are "sharply devalued."

- **Credit for experience abroad.** Granting limited or no credit for experience abroad, requires immigrants to complete in-service programs in some professions.

- **Retraining and examination requirements.** Requirements appear to be more stringent in some professions than others. Immigrants cited the length of the required retraining period as a particular barrier given they had no means of support for themselves or their family. To qualify more quickly, many wanted to try exams without completing a retraining program. In some professions the number of exams required, the cost of examination, and the lack of feedback from the examination process represent barriers. Immigrants also cited translation difficulties with trade exams.

- **Perceived discrimination.** Discrimination was, to many of our respondents, the major barrier for immigrants. The general perception of immigrants is that there are "101 ways to keep you out." While this may be a general reaction to a series of requirements established by the trades and professions, some specifics were cited to support the view that "all readily granted equivalencies are from white-dominated countries -- Australia, England, the United States."

### 4. Immigrant groups have little information of the extent of the problem

While several agencies keep records that might be used to assess the extent of the certification problem, only one project in London had summarized data on clients. Those data suggest severe under-employment of professional women, but do not show if this stems from problems with certification.

### 5. Possible solutions suggested by immigrant groups

Immigrant groups suggested a number of possible solutions to the problems they reported:

- **Education** of immigrants with respect to Ontario requirements, and a cultural sensitization of licensing bodies with respect to dealing with immigrants.
- **Realistic counselling** and information before immigration. Some immigrants report this is not yet standard practice.
- **Improved assessment of foreign credentials.** Immigrants advocated setting up a comprehensive and authoritative service for assessing equivalencies.
- **Flexibility of retraining.** Immigrants called for condensed refresher courses and recognition of on-the-job training in place of attending universities or colleges.
- **Support programs.** Immigrants felt that support programs should be provided for:
  - Financial support while studying technical English or taking retraining.
  - Taking on-the-job training programs.
  - Wage subsidies so employers will hire immigrants allowing them to get necessary Canadian experience.
  - Assistance with identifying jobs in a related field if an immigrant cannot get certified.

- **Challenge exams.** Some immigrants advocated a single comprehensive exam as the single criterion for certification.

## C. THE LAW, REGULATIONS AND PROCEDURES

We reviewed the entry processes of twenty-five professional organizations, as described in the Act and/or Regulations. We attempted to confirm our understanding with each organization by letter and we interviewed representatives of seven professional organizations. The entry processes and record systems of three professional organizations were suitable for more extensive investigation of the data. All three provided access to their data, allowing us to extend our analysis.

### 1. Stated entry requirements

The review of entry requirements for the professions led to these general observations:

- **Few professions offer an impartial assessment of academic qualifications.** Most review credentials on a case-by-case basis, relying on the subjective assessments of a review panel. A few professions use objective evaluating examinations that allow a candidate to demonstrate academic equivalency to Canadian programs.

- **Most professions give little credit for work experience.** Where internship or clinical experience is required, professions are inconsistent in the exemption allowed for experience in another country.

- **Language proficiency required for examinations may not match that required for practice.** Many professional organizations rely on the Test of English as a Foreign Language (TOEFL) to assess English proficiency. The test may under-emphasize technical vocabulary and over-emphasize fine points of grammar.

- **Retraining opportunities may be limited.** Most professions rely on academic institutions. Some professional schools admit only a small fraction of applicants.

- **Accessibility of internships is difficult to assess.** In some cases, notably medicine, internships are difficult to secure. In other professions, they seem readily available.

### 2. Resolution of formal complaints to adjucative bodies

The resolution of formal complaints submitted to the Human Rights Commission, the Health Disciplines Board and the Supreme Court of Ontario, Divisional Court reveals inconsistency in the application of the Acts and Legislation. Generally, their records do not take note of the complainants' ethnicity and the records of decision do not note whether a given complaint was relevant to a particular minority group. In many cases, the subject of the complaint could apply equally to an immigrant or a candidate trained in another province. Consequently, analysis of these records contributed little to our understanding of entry barriers.

### 3. Analysis of summary data from three professions

Summary data provided by three professional organizations (chartered accountants, psychologists, physiotherapists) show no significant differences on the basis of gender.

### 4. Analysis of data on individual applicants

We examine detailed data on applicants and inquirers in three additional professions (pharmacists, nurses, engineers). The professional organizations cooperated with our study, giving us access to their records.

The success of pharmacy applicants is related to gender and country of training. Our examination shows that most candidates became licensed

pharmacists within the expected period of time (three years). An analysis of the data on candidates trained overseas shows:

- Female inquirers are more likely to be registered as students.
- Inquirers from the United Kingdom are less likely to register as students and inquirers from the United States were more likely to register.
- Once registered as students, males require less time to become licensed and very young applicants require more time to succeed in the qualifying exam.

The records of the College of Nurses of Ontario on those who inquired about the entry requirements provided little data useful to our analysis, so we sampled applicants and registrants who paid their evaluation fees in 1985. The results show that immigrants from countries where the dominant language is other than English or French (especially countries other than United States) will encounter greater difficulties becoming certified in Ontario than will other applicants.

The process of entry to the engineering profession relies on subjective review of qualifications and experience. Data on applicants reveal that 26% of 1985 applicants have been registered as professional engineers -- a lower proportion than expected by APEO. The analysis shows that the number of examinations required of foreign trained applicants was statistically related only to the characteristics of the undergraduate degree obtained. The data available did not allow us to identify the country of training for each applicant.

## D. ACCESS TO TRADES IN ONTARIO

If an immigrant has worked in a trade for a period longer than the Ontario apprenticeship, the Ministry of Skills Development usually grants a Provisional

Certificate. In some cases a Demonstration of Skills Test may be required. Candidates who fail to satisfy either of these conditions are directed to an apprenticeship program to complete their qualification. Holders of Provisional Certificates are expected to write the Certificate of Qualification exam for their trade.

The review of the trades identified some potential areas of concern:

- **Assessment of credit toward apprenticeship training.** Local Advisory Committees or employers determine the credit toward the apprenticeship requirements -- generally not more than half of the hours needed for apprenticeship, requiring at least two years of apprenticeship training.

- **Educational requirements exceed the level specified in the regulations.** Local groups and some employers require Grade 12 while the Ministry has set the minimum requirement at Grade 10.

- **Potential wage penalty for holders of the Provisional Certificate.** The immigrant may be doing the work of a journeymen but paid less.

- **Language barriers at the Certificate of Qualification exam.** Although translators are allowed, some immigrants fail because of language difficulties.

- **Ministry data do not allow tracking of candidates who have not yet obtained the Certificate of Qualification.** Some immigrants may suffer lower wages and career prospects because they do not complete the Certificate of Qualification quickly and neither the Ministry nor the employer follow up.

## E. CONCLUSIONS AND RECOMMENDATIONS

Our review came to three general conclusions:

- Entry requirements have a disproportionate impact on minority and ethnic groups. Those whose background does not closely match the norms for Ontario-trained candidates will take longer to qualify, may require more assistance and may have restricted access to assistance.

- Entry requirements rest largely with certifying bodies unless a challenge is raised under the Human Rights Code.

- Systemic barriers are administrative, economic and cultural in origin.

As a result of our investigations, we recommend a series of Phase II projects:

- **A Phase II study should provide a rigorous assessment of the extent of barriers and their consequences for employment and earnings of immigrants.** This report may under-represent the extent of the problem because of the limited nature of our investigation. A survey of a representative sample of immigrants would provide reliable estimates of immigrants' qualifications and experience in their country of origin and the recognition of these qualifications and experience in Ontario. These data will provide a better understanding of the extent of the problem and therefore of the appropriate responses by the Government of Ontario.

- **Professional organizations should keep more complete records and report regularly to the Government of Ontario on the progress of immigrants towards certification.**

- **The Ministry of Skills Development should trace immigrants who hold Provisional Certificates, monitoring their progress toward the Certificate of Qualification.**

- **A Phase II study should review two possible alternative methods of assessing academic equivalencies.** Experience of other jurisdictions with the use of a central repository of educational equivalencies should be examined. The study should also review the current state of the art of selection testing. These techniques could provide an alternative approach to structuring an evaluating examination that would provide an objective measure of academic equivalence that is neutral in terms of race, gender and ethnicity. The study should assess the relative merits of each approach and recommend a course of action for Ontario.

- **A Phase II project should assess the practices of the professions and trades on granting credit for work experience.** Credit for work experience is treated differently among the professions, based on basic differences of principle. Therefore, a more detailed examination should investigate the treatment of work experience by all professions.

- **A Phase II study should assess the appropriateness of the Test of English as a Foreign Language (TOEFL) to the language needs of practising professionals.** Language proficiency tests rely on the Test of English as a Foreign Language. The test should be examined for its relevance to professional practice in Ontario.

- **Government should ensure a free flow of information** with respect to:

  - Discussion of academic equivalencies.
  - The views of certifying bodies with respect to requirements.
  - The reactions of immigrant groups to the processes of certifying bodies.
  - The understanding of immigrants about certification requirements.

- **The Government should promote cultural sensitization for licensing bodies.**

- **The Government should undertake a detailed analysis of the trades with respect to immigrants admitted to apprenticeship training and the progress of immigrants holding Provisional Certificates toward the Certificate of Qualification.**

- **The Government should examine the success rate of individuals facing language difficulty on the Certificate of Qualification exam to ensure that current provisions are satisfactory.**

The findings of this study suggest that first priority should be given to the study of alternative methods of assessing academic equivalencies, to promotion of information exchange, to the analysis of immigrants entering the trades and to an assessment of the appropriateness of the Test of English as a Foreign Language. To provide insight into the magnitude of the problem and the appropriate stance for Ontario, serious consideration should be given to the rigorous assessment of the nature and extent of barriers. The remaining initiatives should follow as important but lower priority items.

# III

# BACKGROUND TO THE STUDY

## A. CONTEXT OF THE STUDY

The Cabinet Committee on Race Relations appointed an Inter-Ministerial Committee to provide guidance to this study. The Steering Committee drafted the terms of reference for this study which state the purpose of the study as follows:

> ... to identify requirements for entry into professions and trades which appear as barriers for persons whose qualifications were received outside Canada, and to identify any such requirements which have a disproportionately negative impact on members of minority and ethnic groups.

The terms of reference call for this study "To identify the nature and extent of the problem, to be followed by a more in-depth study whether warranted". The full terms of reference are shown in Appendix A.

Since this is an exploratory study, the findings should not be taken as strictly representative of all trades and professions in the province. Rather, they should be viewed as the results of a series of contacts that have explored whether or not there exist requirements for entry to the trades and professions that might have a negative impact on members of minority and ethnics groups. As set out in our proposal for the study, we have sought to identify "questions" which might warrant further examination in a subsequent study, not to answer them.

The study focuses on requirements for entry to trades and professions as seen from three points of view: immigrants; the formal statements of the Acts and/or regulations; and the data describing inquirers, applicants and their progress toward certification. We did not attempt to adjudicate the merits of any case that came to our attention: our work was directed to a review of systemic issues. When contacted by individuals who wished to bring a particular case to our attention, we noted the characteristics of the situation, the profession or trade, the entry requirement(s) at issue and the personal characteristics of the individual(s) involved to ensure that the underlying issues were considered in our examination of entry requirements.

## B. RATIONALE FOR THE REGULATION OF PROFESSIONS AND TRADES

The underlying rationale for the regulation of the professions and trades grows from the marketplace. The consumer or client of a professional is not expected to be expert in the professional's subject area and therefore cannot make reliable judgments about the competence of the professional. Because of the importance of the service rendered by the professional, a consumer or the general public may suffer serious consequences as a result of incompetent service or improper behaviour. Accordingly, the Province requires self-regulating professions to control the activities of members and to certify their professional competence or issue a licence to practice in Ontario. In the view of the professions, the standards applied to those trained in Ontario should be mirrored in the professional training, leading to qualification, of those admitted to the profession who were trained outside of Ontario.

A small number of trades find justification in the consumer protection rationale that applies to the professions. Regulated trades -- for example motor vehicle mechanic and electrician -- work in areas that directly affect the safety of citizens. Certain services must be carried out by qualified journeymen in

order to assure the consumer of the technical competence of the worker, providing a guarantee of safety of the work.

The more general rationale for trades springs from the issue of portability of skills. Trades training follows a long tradition of a craftsman passing on skills to an apprentice. The training tends to be carried out largely in the work place. In Ontario, trades tend to reflect the standards of the work place and the expectations of employers. The general argument for regulated trades is the assurance to an employer that a journeyman possesses the core set of skills that have been defined for the trade and reflected in Ontario's regulations.

## C. HUMAN RIGHTS CONSIDERATIONS

The Ontario Human Rights Code Part 1, sets out the requirements for freedom from discrimination. Part 2 provides an interpretation and application of the general principles of Part 1. Of particular interest to this study is section 10, which states:

> (1) A right of a person under part 1 is infringed where a requirement, qualification or consideration is imposed that is not discrimination on a prohibited ground but that would result in the exclusion, qualification or preference of the group of persons who are identified by a prohibited ground of discrimination and of whom the person is a member, except where
>
> (a) the requirement, qualification or consideration is a reasonable and bona fide one in the circumstances; or
>
> (b) it is declared in this act that to discriminate because of such ground is not an infringement of a right. 1981, c.53, s.10.
>
> (2) The Commission, a board of inquiry or a court shall not find that a requirement, qualification or factor is reasonable and bona fide in the circumstances unless it is satisfied that the

needs of the group of which the person is a member cannot be accommodated without undue hardship on the person responsible for accommodating those needs, considering the cost, outside sources of funding, if any, and health and safety requirements, if any.

(3) The Commission, a board of inquiry or a court shall consider any standards prescribed by the regulations for assessing what is undue hardship.

Clearly section 10 has implications for this project. Suppose that a profession establishes a requirement for admission that might work to the particular disadvantage of a minority group. If challenged, the profession must show that the requirement is both reasonable and valid and that to grant an exemption to a minority group would create undue hardship, perhaps argued on the basis of cost to the profession or a health and safety risk to the public.

## D. THE PROCESS OF THIS STUDY AND THE REPORT

The study was conducted by developing three parallel lines of inquiry. The following chapters summarize each of these in turn.

Our objective in the three substantive chapters is to provide the views of the respondents and the data they provided with minimal editorizing on our part. Therefore chapter IV presents the views and perceptions of immigrants, often expressed in their own words. We report those views so the reader can understand why immigrants react as they do and can sense first hand any gaps that exist in understanding or in communication.

Similarly chapter V reviews the regulations and policies of the professional organizations and summarizes the analysis that was carried out with the cooperation of three professional organizations. This analysis probes more deeply into the detailed records of the professional organizations to explore the experiences of immigrant applicants.

Chapter VI provides the views of the Ministry of Skills Development, employers and unions with respect to the certification of immigrants in the regulated trades.

Chapter VII performs a dual purpose:

- Summarize our findings, linking observations and data drawn from the three substantive chapters.
- Develop recommendations for Phase II, summarizing the findings related to each recommendation and presenting the preliminary terms of reference for further investigation.

In summary, the report presents the results of a broadly-based scan of entry requirements for trades and professions in Ontario. The report does not seek to pinpoint specific cases of discrimination. It summarizes the results of the three lines of inquiry to identify structural or systemic issues that could be discriminatory or could be vulnerable to a discriminatory bias on the part of an individual or groups of individuals. Finally, the report presents recommendations for Phase II: further more focused investigations and an initial exploration of some potential avenues of improvement.

# IV

# IMMIGRANTS' PERCEPTIONS ABOUT ACCESS TO PROFESSIONS AND TRADES

## A. CONTACTS WITH IMMIGRANTS/IMMIGRANT GROUPS

### 1. Process of identifying and contacting groups

We used a number of strategies to find knowledgeable individuals and/or groups to interview for this study. We began by asking both provincial (Women's Directorate, Human Rights Commission, Citizenship and Culture) and federal officials (Employment and Immigration) for possible contacts. We also approached the Ontario Council of Agencies Serving Immigrants (OCASI) for a membership list.

From these preliminary contacts, we obtained three listings of immigrant groups which served as our primary source of suitable interviewees. These lists were:

- "Guide to Race Relations Organizations -- Metro Toronto Area" (from the Ontario Human Rights Commission).
- Immigrant Settlement and Adaptation Program funded agencies (from EIC).
- OCASI membership list.

We chose five interview sites because of the large number of immigrants settling in these communities: Hamilton, Kitchener-Waterloo, London, Ottawa and Toronto.

In Toronto, we had a wide array of potential contacts. We chose groups primarily on the basis of recommendations from the Human Rights Commission or referrals from other interviewees. We tried to ensure that our selections represented an appropriate range of immigrants' countries of origin both in terms of number of immigrants and in terms of reported difficulties with certification. We were able to reach informed contacts with knowledge of immigrants from the Caribbean, Central/South America, Eastern Europe, the Philippines, South Asia and South-East Asia. We did not meet with groups from other countries such as Great Britian, Australia or the United States.

In the other communities, we found a much smaller number of organizations serving immigrants. We were able to contact most of the organizations that represent significant numbers of immigrants.

In contacting groups, we tried to use the following general strategy:

- Making a preliminary telephone call to explain the study and ask for an interview.
- Sending out a letter (Appendix B) describing the purpose of the study and outlining the questions we hoped the interview would answer, with a copy of the Attorney-General's press release attached.
- Conducting an in-person interview lasting one to two hours.

We used this approach to our contacts in Kitchener-Waterloo, London and Toronto. In Ottawa, time did not allow us to send the explanatory letter before the interviews. In Hamilton, our associate researcher spoke to over 40 individuals about the study but none agreed to an interview. In that city, we finally did telephone interviews with contacts identified by an organization in London.

Groups' responses to our invitation were on the whole very helpful and cooperative. Some groups, however, chose not to be interviewed. In most

cases, this was because the organization's contact person felt that he/she was not sufficiently familiar with the issues. In one case, the organization felt it had to adopt a formal "position" before speaking to us. With three contacts, we were asked to pay an honorarium. These individuals were concerned about consultants being paid for making use of the informants' time and expertise. When we said we could not pay a fee, however, the contacts agreed to participate anyway.

With many of our contacts, we spoke with a single individual representing an organization. In two cases, we were invited to attend staff meetings which proved very fruitful. In two other situations, our primary contact arranged for others to attend the interview. This was also a helpful approach.

Finally, we received several telephone calls in response to the press release announcing the study. These calls came from individuals with personal experience in trying to have foreign credentials recognized for certification in Ontario. In some cases, the experiences dealt with careers outside the regulated trades and professions covered by this study. Otherwise, we considered the opinions of the individuals along with those expressed by immigrant groups. We did not attempt to adjudicate the merits of these or any other cases that came to our attention during this study. As noted above, this study focuses on systemic issues, not on the particulars of any case.

## 2. Organizations Contacted

In total, we made preliminary contact with over 30 organizations across the province. We completed interviews with more than 45 individuals representing 24 groups.

Exhibit IV-1 shows the organizations we contacted. The single asterisk (*) indicates groups who chose not to participate. The double asterisk (**) indicates groups interviewed by telephone. The number in brackets after each organization's name is the number of individuals we interviewed through the organization.

**EXHIBIT IV-1**
**List of organizations contacted**

| | | |
|---|---|---|
| **TORONTO** | | |
| | Coalition of Visible Minority Women | (1) |
| | COSTI - IASS -- Immigrant Services | (2) |
| | Philippine Association for Academic Accreditation | (1) |
| | Immigrant Women's Job Placement Centre | (7) |
| | Jamaican Canadian Association | (1) |
| * | Kababayan Community Services | |
| | Labour Council of Metro Toronto | (1) |
| * | Mayor's Committee on Race Relations | |
| | Neighbourhood House | (2) |
| | Ontario Federation of Labour -- Human Rights | (1) |
| | Riverdale Immigrant Women's Centre | (5) |
| * | South Asian Social Services | |
| | Urban Alliance on Race Relations | (1) |
| ** | Vietnamese-Cambodian-Laotion Services | (1) |
| * | Women Working with Immigrant Women | |
| **HAMILTON** | | |
| * | Mayor's Committee on Race Relations | |
| ** | Hamilton Multi-cultural Centre | (1) |
| ** | Hamilton and District Labour Council -- rep to Mayor's Committee | (1) |
| ** | Mohawk College -- Job Readiness Instructor | (1) |
| **KITCHENER-WATERLOO** | | |
| | Regional Folk Arts Multi-cultural Centre | (1 plus a general presentation to 25 board members) |
| | Mennonite Central Committee -- K.W. | (4) |
| | Mennonite Central Committee -- Aylmer | (1) |
| | Immigrant Women's Project | (2) |

**EXHIBIT IV-1 (Continued)**
**List of organizations contacted**

| | | |
|---|---|---|
| **LONDON** | | |
| | Cross Cultural Learner Centre | (3) |
| | Women Immigrants of London | (1) |
| **OTTAWA** | | |
| | Catholic Immigration Centre | (1) |
| * | Dalhousie Health and Social Services | |
| | Jewish Social Services of Ottawa - Carleton | (2) |
| | Multi-cultural Women's Centre | (2) |
| | Ottawa - Carleton Immigration Services | (2) |
| * | Ottawa - Chinese Community Service Centre | |

* Preliminary contact only

** Telephone interview

( ) Number of individuals interviewed in association with organization.

We must stress that the "sample" listed is not a systematic one. Many other groups could have supplied information if asked. This list reflects only the groups we selected and were able to reach within the time and budget allowed for the study. While their comments are remarkably consistent, we cannot assume that they speak on behalf of all immigrants and all immigrant groups.

### 3. Evidence on gender, race and ethnic factors in entry barriers

The Steering Committee asked us to identify any entry barriers that were specifically related to gender, race or ethnicity. In this chapter, we do not highlight these factors for two reasons.

- Our sample is not systematic. While we tried to reach people from many different backgrounds, our interviews did not reach all types of immigrants equally or in proportion to their population. Consequently, any attempt at this point to relate a particular entry barrier to gender, race or ethnicity would be misleading. A large, systematic sample of immigrants would be needed before we could draw any inferences about the influence of these factors on certification.

- Our overall impression is that most entry barriers have a disproportionate impact on immigrants of both genders, all races and most ethnicities. The extent of the barrier depends on how well the person matches Ontario-based norms. While a particular immigrant may perceive an entry requirement as discrimination based on gender, race or ethnicity, our interviews suggest that entry barriers may be perceived by any person who does not precisely fit certification requirements.

## B. IMMIGRANT GROUPS' PERCEPTIONS ABOUT WHICH PROFESSIONS AND TRADES PRESENT ENTRY BARRIERS

In our interviews, we began by asking which professions and trades pose problems for immigrants in terms of having their foreign-obtained credentials recognized for certification in Ontario professions and trades. Their responses

depended largely on the nature of their personal familiarity with the question or their clients' experience. Not all interviewees were equally familiar with all professions and/or all trades. Consequently their answers cannot be viewed as a **statistically** valid picture of the problems.

### 1. Professions

Exhibit IV-2 shows the professions mentioned by our respondents as posing accreditation barriers for immigrants.

**EXHIBIT IV-2**
**Professions posing accreditation barriers, as identified by interviewees**

| | | |
|---|---|---|
| Accounting | Medicine | Teaching |
| Architecture | Nursing | Veterinary Medicine |
| Dentistry | Occupational/Physiotherapy | Radiological Technicians |
| Dietician | Pharmacy | |
| Engineering | Physiotherapy | |
| Law | Psychology | |

Not all professions were mentioned with equal frequency. Medicine and teaching were indicated as problems by the majority of interviewees. Engineering and nursing were the next most frequently mentioned, followed by accounting, law, dentistry and architecture. The remaining professions were referred to by only one or two respondents.

We must caution that frequency of mention does not necessarily parallel the severity of the entry barriers. Possibly, it could also reflect either the number of immigrants claiming that occupation or the amount of effort that certain professionally qualified immigrants have put into bringing their problems to light.

Three of our respondents spontaneously assigned "problem priorities" to the professions. Their orderings, as shown in Exhibit IV-3, are not identical. This lack of concensus on "degree of entry difficulty" suggests that the question of which professions present the **greatest** barriers will have to be answered by other means. As one respondent stated "It's not one profession, it's all professions".

**EXHIBIT IV-3**
**Examples of respondents' ordering of "problem priorities" — descending degree of difficulty**

| Respondent A | Respondent B | Respondent C |
|---|---|---|
| Doctors | Accountants | Doctors |
| Dentists | Engineers | Lawyers |
| Engineers | Teachers | Engineers |
| Physiotherapists | Lawyers | Teachers |
| Nurses | Nurses | |
| Accountants | Doctors | |
| Teachers | | |

## 2. Trades

In general, our respondents seemed less familiar with entry barriers in the trades[1] than in the professions. Those mentioned include:

- Auto Mechanics
- Electricians
- Millwrights
- Hairdressers

[1]Although it falls outside the scope of this study, several respondents mentioned that access to **employment** in trades was a problem for Eastern European women, many of whom have training and experience in "non-traditional" areas.

- Welders
- Watchmakers

When asked why the trades seemed to pose fewer certification problems than professions, respondents gave a variety of answers. Some examples are:

- Fewer skilled trades people than professionals immigrate because tradesmen cannot afford to leave their own countries.
- Immigrant trades people may have "years and years of experience but no paper". Reportedly, some immigrants believe they are not eligible for trade certification, so they do not try -- nor do they raise formal complaints about the system.
- When they find out what they have to do to qualify, immigrants "can't be bothered to write exams" and decide to "work under the table" or "go into something else".
- Certification is less of a problem than discrimination in hiring.

### 3. Other occupations

Several respondents mentioned barriers to entry in occupations that are not self-regulating by statute. For the sake of completeness, we list these below:

- Drafting
- Early Childhood Education[2]
- Laboratory Technician/Technologists
- Librarians
- Midwives

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[2]According to regulations under the **Day Nurseries Act**, day nursery supervisors are required to have an Early Childhood Education diploma or equivalent (Reg.58a,b,c). The Ministry of Community and Social Services funds the Association of Early Childhood Education to assess equivalencies.

- Social workers
- Ultra-sound technicians

## C. IMMIGRANT GROUPS' PERCEPTIONS OF THE NATURE OF ENTRY BARRIERS

We asked our respondents to describe the nature of the barriers that immigrants encounter. For ease of discussion, we can identify five major barriers:

- English proficiency
- Evaluation of academic credentials
- Credit for experience abroad
- Examination and re-training requirements
- Discrimination

### 1. English proficiency

The requirement for English proficiency was seen as a "tremendous barrier" by most of those we interviewed. Immigrants find it difficult to reach an adequate level of proficiency because the necessary programs and supports are lacking.

According to respondents, EIC will support immigrants for a maximum of six months of English as a Second Language (ESL). "But if you're a professional, you don't even get that. They assume you can manage on your own." As most immigrants must find work as soon as possible, continuing ESL studies on their own is difficult. Further, ESL classes rarely provide the technical vocabulary that immigrants need for certification exams.

We heard many comments about the Test of English as a Foreign Language (TOEFL) exam. Although this is exam is an entry requirement for several professions, TOEFL preparatory classes reportedly are not always available. "No one institution will take the responsibility for offering it on a regular basis", said a respondent in Kitchener-Waterloo. One respondent commented on the stringency of the pass criteria: "One double negative and you're out." Her concern was echoed by another respondent, who mentioned that native English speakers acting as volunteer TOEFL tutors say "We couldn't pass it".

### 2. Evaluation of academic credentials

Academic credentials were mentioned as an entry barrier for a number of reasons. As we were told, most professions require the immigrant to provide original certificates and/or transcripts. This is reportedly a problem for refugees who may not have been able to bring their documents with them. Even if the individual has the documents, other difficulties arise. The requirement to submit original documents, not copies, is hard for immigrants "who may be terrified to put their originals in the mail. If they are lost, they cannot be replaced". In the nursing profession, the documents "must come directly from the school". Accomplishing this is costly and time-consuming for many immigrants. For others, especially refugees, "it is impossible". The school may no longer exist or, particularly in Eastern Europe or the Republic of China, may refuse to cooperate.

According to our respondents, translation and interpretation of foreign credentials is also a problem. We were told that the Provincial Government translation bureau provides "a good service but not an excellent service". "Poor translation has led to some people having applications for equivalency rejected."

Even when documents are available in a good translation, some of our respondents find that "people are ignorant about foreign educational systems and what a degree means". For example, grades can be given by letter, by percentage or on a scale of 1 to 10. The meaning of a course grade is difficult to determine, as is the actual content of courses listed on a transcript. According to reports, this lack of information leads those assessing credentials to be rather rigid in interpreting the equivalency of foreign credentials.

Finally, many of our respondents spoke about the "down-grading of qualifications". From their comments, most immigrants use either the Ministry of Education or the University of Toronto service to have their credentials assessed. Reportedly, both of these "sharply de-value" foreign credentials. For example, we were told of an English-trained and certified accountant from Guyana who was given an Ontario equivalency of Grade 13. According to one respondent, the Ministry of Education makes an assessment by "counting up years of schooling. They don't look at the subjects".

The down-grading of credentials is perceived as a problem by a variety of professionals from many different countries of origin. For instance, we were told about dieticians from India, architects from Eastern Europe, doctors from Africa, pharmacists from Vietnam -- all of whom had their credentials discounted.

This problem, however, was particularly mentioned with regard to nursing, teaching, law, engineering, physiotherapy and accounting. It appears to immigrants that unless a course or program is exactly equivalent to the Ontario counterpart, equivalency is not granted. Then, immigrants are apparently not allowed to write certification exams in some professions (e.g. nursing, accounting, law) until they have taken re-training. This will be discussed further in Section 4 below.

Most of our respondents believed that dramatic down-grading is the rule. However, we were told that graduates of Central American universities generally lose only one year of credit. Degrees from the University of the West Indies are reportedly accepted as equivalent.

### 3. Credit for experience abroad

Many respondents told us that certification processes in Ontario give little or no weight to foreign experience. "A man with years of experience is treated like a new graduate." For example, a Filipino lawyer with 15 years experience was required to do the Legal Skills Aptitude Test -- a pre-law school requirement. If a person lacks exactly comparable academic credentials, experience is reportedly not considered an adequate substitute.

With their foreign experience not taken into account, some immigrants report difficulty getting the Canadian experience they need for certification. In some cases, immigrants feel they are in "Catch-22" situation. They cannot get a certificate to practise without Canadian experience but without certification, they cannot get the jobs they need to get the required Canadian experience.[3]

Discounting of experience is also perceived as a serious problem in the trades. As we were told, in some countries, some trades do not have a formal certification process -- training is "on-the-job". Trades people with many years of experience in their own countries -- as auto mechanics or hairdressers, for example -- do not have papers. But they reportedly find that their experience is not taken into account. "Canadian experience is needed before they can get into certain apprenticeship or training situations." Our respondents

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[3]"Canadian experience" was mentioned by many respondents as a major barrier to employment of any kind -- not only in trades or professions. This question, however, was outside the scope of our study and we do not address it in detail.

were not clear, however, whether this problem stems from the certification process or from employer attitudes and job descriptions which specify particular credentials and Canadian experience.

### 4. Re-training and examination requirements

As discussed in Section 2 above, equivalencies for foreign credentials reportedly are rarely given. Respondents report that many immigrants are directed to take re-training or upgrading. In some professions (e.g. nursing, teaching, law, accounting) immigrants say that the re-training requirements are particularly stringent. They report being required to take particular courses through designated institutions. In some professions (law, physiotherapy, dietetics), they are required to "virtually re-do their degrees".

To illustrate this point, we note two examples that immigrants cited as unfair or unreasonable. A lawyer from the Philippines was directed to complete two years of law school and do his articles and the bar admission course prior to writing the Bar Admission exam. A dietician from India was required to do a Canadian M.A. before she was eligible for an internship. These and other immigrants felt that because of their experience and previous training, they should have been given an opportunity to re-train through on-the-job training or a program of self-study, rather than through the formal education process.

Our informants report that lengthy re-training is a problem for most immigrants. Most immigrants "need to work" as soon as possible. They have no way to support themselves or their family through extensive re-training. If they are working, classes may not be scheduled conveniently or they may be too tired to study. As one respondent put it, "If you can't learn English and find employment in your field within one year, you might as well forget it. Once you take a job in a factory, especially if you're a woman with children, you're too tired to take courses".

Some respondents expressed frustration that people are required to re-train before they can write certification exams. They felt re-training was more appropriate if a person failed the exams. Others were concerned about the lack of support and assistance available to immigrants who are preparing for exams. As one respondent described the engineering exams "You send off $30 for a membership fee, hear nothing for six months, then you get a letter one week before the exams. There is no back-up with a syllabus or a reading list or anything".

With regard to the examination process, informants voiced a number of concerns. Some of their comments were profession or trade-specific while others were more general.

In engineering and accounting, respondents' concern focussed on the number of exams individuals were required to write. Some respondents felt a single, comprehensive exam would be more appropriate. In medicine, the frustration expressed by immigrants centred on the inability of foreign-trained doctors to get internships after they had passed all the necessary qualifying exams. In dentistry, the sheer cost of the exam is seen as a "tremendous" barrier. According to reports, the individual is required to transport her/himself and a patient to either Montreal or Vancouver, plus pay the cost of materials. For refugees in particular, this was felt to be beyond their means. Auto mechanics also face a cost problem, as they must purchase their own tools. In other professions and trades, the costs of getting transcripts, paying membership fees, examination charges, etc. can be "too much" for immigrants with limited incomes.

Other general concerns centred on the nature of the examinations themselves. A number of respondents questioned whether exams can actually measure the individual's ability to do the job. As one commented "The proof is in the pudding -- if you can function". A more specific concern was voiced by an individual who pointed but "It's annoying that to get a Canadian equivalency you write an exam based on American textbooks".

In the trades, the major difficulty with the examination appears to be translation. Some respondents were aware that a translator could be used for exams. Finding a translator "who's not in the trade" and "hasn't translated in the last twelve months" is reported as a major obstacle.

Some individuals queried the criteria used to decide whether an immigrant had passed or failed. This was particularly mentioned in regard to dentistry. Apparently, examinees are not given any feedback on why they failed and rumour has it that the examiners work to a quota: "they only ever pass two" people.

### 5. Systemic discrimination

To many of our respondents, the major barrier for immigrants is systemic discrimination. The barriers described above are seen as "101 ways to keep you out". "People can't understand ... they see it as discrimination." With "all the hoops they have to go through", it seems as if immigrants are being told "we don't want you".

Some respondents describe the discrimination as "racist" pointing out, for example, that "all readily granted equivalencies are from white-dominated countries ... Australia, South Africa, England".

Others see the discrimination as "cultural" rather than racist: "Blacks, Europeans and Asians encounter the same thing -- they don't have the credentials". Some view certification procedures as reflecting an attitude of "cultural domination and superiority". "It's as if they're saying Ontario training is the best in the world."

Many of our respondents view certification requirements as discrimination on behalf of those already in a trade or profession. As one commented, "It's a fraud and fiction that self-regulation protects the public". Another said,

"Those regulations are set up for one purpose and that's to protect themselves". To many "it seems obvious that associations are using the power given by government to protect their professional interest, not the public".

A few informants did mention the need for public safety. They recognized differences in the technological levels of Ontario compared to some other countries. Individuals seeing this aspect of the problem tended to be Canadian-born or naturalized citizens of long-standing. However, not all Canadian-born or naturalized informants expressed this view.

Overall, the majority of respondents see certification requirements as discriminatory and they see the end result of this discrimination as "a criminal waste of human resources".

## D. WHAT IMMIGRANT GROUPS KNOW ABOUT THE EXTENT OF THE PROBLEM

We asked immigrant groups about the number of immigrants who are encountering certification barriers. Only one agency, however, had readily available data. The Immigrant Women's Project in London had recently done a statistical profile of clients for a report to the agency's Board. This job training program found that of 175 clients, 115 were professionals who had not been able to get work in their fields. Their data, however, did not show whether these clients had been able to get certification.

Several agencies we interviewed keep records that could be used to assess the extent of the certification problem. Within the time-frame of this study, and without special support, they were not able to summarize their client statistics for us. Our impression, however, is that many agencies have, in their files, pertinent client information which could be used if an in-depth examination of certification problems was mounted.

## E. POSSIBLE SOLUTIONS SUGGESTED BY RESPONDENTS

We did not specifically ask respondents for solutions to certification problems. Some of these, however, emerged quite naturally in the course of our conversation. We offer a summary of these below.

### 1. Education, Information Exchange and Cultural Sensitization

According to some respondents, education, greater exchange of information and cultural sensitization is needed both for immigrants and for certifying bodies.

In general, respondents indicated that immigrants have little information about the content of various jobs in Ontario. From interviewees' comments, immigrants appear to assume that if they are qualified as a doctor or engineer in their own country, they have the knowledge needed to practise their profession here. They generally did not seem to know if the technical aspects of certain jobs (e.g. computer systems in common use, building codes, drug names) were comparable between Ontario and other countries.

A reportedly successful effort to inform immigrants was provided for Russian-Jewish engineers in the seventies. Ontario Welcome House staff organized an information session with speakers from the University of Toronto engineering faculty, recent Canadian engineering graduates, and the Association of Professional Engineers of Ontario. The session covered certifying procedures and explained the labour market climate for engineers. After the session, the immigrants were able to make better decisions and take the initiative in finding employment.

Many respondents felt that licensing bodies need cultural sensitization. Without this, they may misinterpret an immigrant's behaviour. As an example, some informants suggested that Eastern Europeans may be viewed as "demanding" or "aggressive" when from the immigrants' view they are doing what is needed to move through bureaucracy.

A number of respondents suggested that professional organizations also need to be educated about the "psychological intimidation factor". To an immigrant who may already be anxious and disoriented, certification procedures are bewildering. "When they find out what they have to do, some just give up." "For the sake of the profession", some respondents suggest that professional organizations "should lend a helping hand" to assist immigrants through the "complex" process of becoming certified.

### 2. Realistic counselling and information before immigration

Many of our respondents expressed a need for "realistic" immigrant counselling. Many immigrants apparently believe Canada has "streets paved with gold". "They need to be told how hard it is going to be."

Some respondents felt that if realistic information were provided abroad, some immigrants could make better decisions. "If they knew what they'd have to give up, they wouldn't have come." Others, however, felt "they'd come anyway: they're desperate".

We heard reports of conflicting messages given by immigration officials. Many respondents mentioned that until recently, the immigration process gave points for professional and trade qualifications. In Ontario, immigrants are not allowed to practise the skills that had helped gain entry to Canada. We were told that in some countries, potential immigrants are now given a clearer picture of what to expect. But reportedly, this is not yet standard practise.

### 3. Improved assessment of foreign credentials

Many respondents felt that improved assessments of foreign credentials should be possible. In fact, one respondent gave us an extensive bibliography on this issue (Appendix C).

Practical steps to identify academic equivalencies were suggested by a number of respondents. For example, one informant keeps copies of university and community college course descriptions to use in assisting immigrants to describe their training "in the right jargon". She also finds material from Careers Ontario and the CCDO job descriptions are helpful in making convincing presentations of credentials.

A few respondents suggested that immigrant professionals take the initiative in educating professional organizations in foreign credentials. This is already being done by the Filipino Association for Academic Accreditation. They present information about the nature of their training and already established equivalencies. For example, the Filipino accounting program is patterned after California's and in that state, equivalency is immediately granted on the basis of university transcripts. So far, the Association has met with the three accounting bodies. They have succeeded in gaining credit for five courses toward the C.G.A. and R.I.A. qualifications, and are discussing another four.

Our respondents were on the whole, very cultured, highly educated individuals. From their international experience, they felt it should be possible for professional organizations to find professionals to act as reliable assessors of foreign qualifications. One of these respondents expressed surprise that Canadians do not know, for example, the degree system at the Sorbonne. She also suggested that agencies such as CIDA, IDRC and Canadian embassies could be involved in finding out what types and amount of training foreign degrees represent.

Several respondents suggested that the Ontario government set up a service for assessing equivalencies -- similar to the service offered at the University of Toronto but more comprehensive. They suggested that the computerized system being developed in Quebec could serve as a model.

### 4. Flexibility in re-training

The "rigidity" in re-training requirements was of concern to many respondents. They feel that already qualified people should have a "fast track" for re-training. They pointed out that re-training in generally done through universities or community colleges, in courses designed for young people. But experienced professionals and trades people already have basic skills. While they may need brushing up on Canadian-based content, they "don't need to start at square one".

Many felt that "on-the-job" re-training would be more appropriate, also allowing immigrants to acquire the technical English they require to pass certification exams.

Condensed refresher courses were also suggested by several respondents. We were told that such courses are now available only through "very expensive" private schools. Our informants felt these should be provided by the government. A number referred to successful courses given to Russian-Jewish nurses and doctors. As described to us, these courses were co-sponsored by the Toronto Board of Education and the University of Toronto Faculty of Medicine. The courses reportedly allowed immigrants to get necessary re-training in a condensed and speedy way.

Some respondents felt the method of re-training should be left to the discretion of the immigrant rather than specified by the certifying body. They suggested that formal study, on-the-job training and/or a program of directed studies could be used as appropriate to the individual's preference and circumstances.

### 5. Support programs

Many respondents felt that immigrants need improved support. Some of their suggestions were:

- Financial support while studying technical English or taking re-training.
- On-the-job training programs.
- Wage subsidies so employers will hire immigrants, allowing them to get necessary Canadian experience.
- Assistance with identifying jobs in related fields if an immigrant cannot get certified.

In Ottawa, we spoke with staff of an inter-agency program of job placement and job-finding that is already providing some of these supports. As the program has only been running a few months, staff members could not comment with confidence on program effectiveness. Preliminary results suggest that wage subsidies are helpful in getting on-the-job training for trades people but not for professionals. The "Job Finding" club, which assists with resume-writing and interview skills, has reportedly had some success in helping people find employment that uses their training and experience.

**6. Challenge exams**

The idea of a single, comprehensive challenge exam was put forward by some respondents. They suggested that such an exam should be the single criterion for certification. People should be allowed to write the exam without having to go back to school. The exam would have to be designed to assess practical as well as theoretical skills. It should also be based on a specified syllabus which immigrants could use to prepare for the exam.

V

# THE LAW, REGULATIONS, AND PROCEDURES

This chapter examines potential barriers to entry into professions in Ontario from the perspective of the processes required. We looked at twenty-five professions that are regulated by professional organizations established by law for that purpose. The Attorney General wrote a letter to each of them announcing this study. Due to difficulties with addresses, we did not establish contact with these organizations: Board of Funeral Services; Association of Land Surveyors, Board of Regents of Chiropody. The Ontario Association of Architects did not reply to our letter or to telephone reminders by the cut off date for this report. Thus this chapter is based on documentation for twenty-five professions and contacts with twenty-one professional organizations.

## A. SOURCES OF INFORMATION

### 1. Documentation of entry processes

Our analysis uses flowcharts to depict the entry processes of all twenty-five professions. The flowcharts appear in Appendix D. We based them on information gathered from relevant Acts and Regulations and from correspondence with most of the professional organizations. A copy of the letter we sent to the professional organizations appears in Appendix E with the mailing list provided by the Attorney General.

Of the professional organizations we contacted by letter, sixteen returned the flowcharts with either approval or comments that resulted in amendments.

The following organizations provided no comment on the flowcharts:

- Royal College of Dental Surgeons of Ontario
- Board of Directors of Masseurs
- Ontario Board of Examiners in Psychology
- Board of Radiological Technicians

The Association of Professional Engineers of Ontario provided a flowchart of its own, which makes no distinction between applicants trained in Canada and those trained abroad. Appendix D contains both this flowchart and the one we prepared.

### 2. Statistical summaries

We also look at some statistical summaries arising from the entry processes. Again, we acquired the reported information from our correspondence with the professional organizations. However, most professional organizations do not have data systems that can produce the information we requested.

We asked twenty professional organizations to provide data. Eighteen provided at least some numbers. The following organizations could not provide the requested data in time for inclusion in the report.

- Law Society of Upper Canada
- Board of Directors of Physiotherapy
- Association of Professional Engineers of Ontario

In response to subsequent requests by telephone, these professional organizations were able to categorize their summary statistics by gender:

- Institute of Chartered Accountants of Ontario
- Board of Directors of Physiotherapy
- Ontario Board of Examiners in Psychology

We chose these three professional organizations because they had been able to supply relatively complete summary data in response to our first request.

### 3. Interviews in person

We met with representatives of some professional organizations, selected because of the relatively large numbers of professionals they represent. The purpose of such meetings was two-fold:

- To deepen our understanding of the entry process, looking in particular at the policies and practices associated with the Acts and Regulations.
- To explore the potential for extracting more informative data from the organizations' files on applicants and admissions.

We interviewed the Executive Director of the Board of Ophthalmic Dispensers by telephone and visited the following professional organizations:

- Royal College of Dental Surgeons of Ontario
- Law Society of Upper Canada
- College of Nurses of Ontario
- Ontario College of Pharmacists
- College of Physicians and Surgeons of Ontario
- Association of Professional Engineers of Ontario

### 4. Detailed data captured from files

More detailed data on foreign-trained professionals provided a third source of information for our analysis. We captured data from the files on foreign-trained applicants at:

- The Ontario College of Pharmacists.
- The College of Nurses of Ontario.
- The Association of Professional Engineers of Ontario.

We did not acquire detailed data from the following:

- Royal College of Dental Surgeons of Ontario. The College uses results from the National Dental Examining Board. The Board did not provide any data to us because the numbers of candidates was, in its opinion, too small. The Board feared misuse of the numbers.
- Law Society of Upper Canada. The Society relies on the deliberations of the Joint Committee on Foreign Accreditation when considering foreign-trained applicants. Data from the Joint Committee had not arrived at the time this report was written. Even if it had, we could not have established the links necessary to follow the progress of an individual.
- College of Physicians and Surgeons of Ontario. The College uses results from the Medical Council of Canada's qualifying exam to evaluate candidates. Again, the links between data needed to pursue an individual's train of progress were not feasible. In this case, we did not attempt to contact the Council.

## B. ANALYSIS OF FORMAL ENTRY PROCESSES

The Acts and/or Regulations stipulate certain conditions for admission into membership in the professional organizations. Membership implies licensure,

registration, or certification, each implying, in turn, a range of particular requirements and controls. In some instances, the professional organizations themselves can establish by-laws or policies to make the interpretation of the legal requirements both consistent and administratively workable. But they cannot impose requirements additional to those specified in their Act or Regulations.

The discussion that follows focuses on five main issues that emerged from our analysis of the processes as potential barriers to entry into professions:

- Evaluation of academic credentials.
- Evaluation of past experience.
- Proficiency in English or French.
- Availability of training needed to meet requirements.
- Access to internship or work experience required for certification.

We rely on the summary data to measure the magnitude of entry problems created by such barriers. We consider the entry process from a general point of view, looking at aspects of a generic process that could either benefit applicants generally or lead to barriers. We then look at the flowcharts to suggest possible sources of such barriers within the entry processes of the twenty-five professions. This section closes with a summary of the problems found, looking at several elements common to many professions.

### 1. Summary data provide little useful information on the size of problems

The generally poor quality of the summary data provided by the professional organizations limits our ability to measure the size of problems related to entry. We had hoped to obtain at least comparable measures of "success rates" for applicants trained in Ontario, in other provinces within Canada and elsewhere. We had defined "success rate" in two ways:

- The ratio of the number of people admitted (licensed, registered, etc.) to the number who applied formally, within a particular year.
- The ratio of the number of people admitted to the number who made either a formal application or an informal inquiry about practice in the profession, within a particular year.

We also wanted to compare these ratios to the total current membership in each professional organization as a measure of the relative importance (in terms of number of professionals affected) of entry problems in that profession.

Problems with data retrieval strongly limited our ability to follow the planned approach. Many professional organizations have made conscious efforts to eliminate references to race, gender, age, or country of origin from their data files expressly to avoid this source of potential bias or discrimination in their treatment of applicants. Sometimes (e.g. pharmacists and dentists) the entry process involves examinations administered by a national body. In these cases, full information about an individual's progress through the process can only come from merging data from two or more sources, a task beyond the resources of this project.

In addition to these general data problems, most of the entry processes take at least one year to complete. Therefore, the number admitted in a year does not necessarily correspond to the number who applied or who inquired, since the people admitted likely applied in an earlier year. We attempted to avoid this problem by asking the professional organizations for the number of applicants during the year in which most of the people admitted would have made their applications. But this is a vague concept at best. Most of the professional organizations either failed to understand fully what we had asked for or were unable to identify the appropriate year as requested. The data are not accurate and the results of the analysis are not useful. Exhibit V-1 indicates that the number admitted often exceeds the number who applied or inquired. Exhibit V-2 shows that the success rates either could not be calculated or are not meaningful, exceeding 100% in most cases.

EXHIBIT V-1 Summary statistics for professional organizations, by profession and origin of training.

| PROFESSION | PROFESSIONAL TRAINING IN: | NUMBER OF CURRENT MEMBERS | | | | NUMBER ADMITTED MOST RECENT YEAR | | | | NUMBER APPLIED (1) | | | | NUMBER OF ENQUIRIES (1) | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Total | Ontario | Other Canada | Other Country | Total | Ontario | Other Canada | Other Country | Total | Ontario | Other Canada | Other Country | Total | Ontario | Other Canada | Other Country |
| Architects | NC | | | | | | | | | | | | | | | | |
| Cert. General Accountants | | 5,705 | NA | NA | NA | 442 | NA | NA | 52 | NA | NA | NA | NA | NA | NA | NA | NA |
| Chartered Accountants | | 20,285 | 16,227 | 2,785 | 1,273 | 1,039 | 782 | 221 | 36 | 1,100 | 825 | 237 | 38 | 1,079 | 1,027 | 27 | 25 (2) |
| Chiropodist | NC | | | | | | | | | | | | | | | | |
| Chiropractors | | 1,476 | NA | NA | NA | 81 | 74 | 0 | 7 | 106 | 95 | 0 | 11 | NA | NA | NA | NA |
| Dental Surgeons | | 5,286 | 4,240 | 653 | 393 | 222 | 159 | 44 | 19 | 222 | 159 | 44 | 19 | NA | NA | NA | NA |
| Dental Technicians | | 442 | NA | NA | NA | 13 | NA | NA | NA | 43 | NA | NA | NA | NA | NA | NA | NA |
| Denture Therapists | | 430 | 430 | NA | NA | 13 | 13 | NA | NA | NA | 13 | 3 | NA | 7 | 3 | 3 | 1 |
| Drugless Therapists | | 160 | 101 | 0 | 59 | 7 | 0 | 0 | 7 | 8 | 0 | 0 | 8 | NA | NA | NA | NA |
| Engineers | | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | 156 (3) | NA | NA | NA | NA |
| Funeral Directors | NC | | | | | | | | | | | | | | | | |
| Insurance Brokers | | 11,799 | NA | NA | NA | 1,283 | NA | NA | NA | 1,797 | NA | NA | NA | 1,200 | NA | NA | NA |
| Land Surveyors | NC | | | | | | | | | | | | | | | | |
| Lawyers | | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| Masseurs | | 900 | 900 | NA | NA | 109 | 108 | 1 | NA | 113 | 108 | 3 | 2 | 46 | 24 | 10 | 12 |
| Nurses | | 103,517 | NA | NA | NA | 3,977 | 3,005 | 677 | 295 | NA | NA | NA | NA (4) | NA | NA | NA | NA (5) |
| Nursing Assistants | | 34,237 | NA | NA | NA | 1,349 | 1,229 | 96 | 24 | NA | NA | NA | NA (6) | NA | NA | NA | NA (7) |
| Ophthalmic Dispensers | | 1,387 | NA | NA | NA | 83 | 81 | 1 | 1 | 70 | 67 | 2 | 1 | NA | NA | NA | NA |
| Optometrists | | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| Osteopaths | | NA | NA | NA | 25 | NA | NA | NA | 0 | NA | NA | NA | 0 | NA | NA | NA | 0 |
| Pharmacists | | 6,770 | NA | NA | NA | 317 | 135 | 80 | 102 | 320 | 137 | 80 | 103 | NA | NA | NA | NA |
| Physicians and Surgeons | | 23,243 | NA | NA | NA | 2,415 | NA | NA | NA | 3,500 | NA | NA | NA | 1,100 | NA | NA | NA |
| Physiotherapists | | 2,902 | 1,724 | 436 | 742 | 278 | 137 | 68 | 73 | 279 | 137 | 68 | 74 | NA | NA | NA | 37 |
| Psychologists | | 1,157 | 744 | 99 | 314 (8) | 78 | 48 | 14 | 16 (9) | 106 | 71 | 20 | 15 | 220 | NA | NA | NA |
| Radiological Technicians | | 4,508 | 3,646 | 634 | 228 | 415 | 336 | 57 | 22 | 66 | 23 | 18 | 25 | NA | NA | NA | 8 |
| Veterinarians | | 2,344 | 2,031 | 93 | 220 | 145 | 102 | 27 | 16 | 152 | 102 | 30 | 20 | 71 | 7 | 8 | 56 |

NOTES:
- NA Data not readily available.
- NC Failed to make contact.
- (1) Data refer to a previous year, selected by the professional organizations as the most likely time of application for candidates admitted during the most recent year.
- (2) Data represent three months only.
- (3) Estimate based on two-thirds sample.
- (4) Other Canada and Other Country combined amounted to 1,208.
- (5) Other Canada and Other Country combined amounted to 826.
- (6) Other Canada and Other Country combined amounted to 236.
- (7) Other Canada and Other Country combined amounted to 212.
- (8) Responses to member survey.
- (9) Permanent registration, excluding temporary.

EXHIBIT V-2 Entry success rates for professional organizations, by profession and origin of training.

| PROFESSION | PROFESSIONAL TRAINING IN: | NUMBER OF CURRENT MEMBERS | | | | FORMAL APPLICANTS ONLY (1) | | | | ENQUIRERS PLUS APPLICANTS (1) | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Total | Ontario | Other Canada | Other Country | Total | Ontario | Other Canada | Other Country | Total | Ontario | Other Canada | Other Country |
| Architects | NC | | | | | ERR | ERR | ERR | ERR | ERR | ERR | ERR | ERR |
| Cert. General Accountants | | 5,705 | NA | NA | NA | ERR | ERR | ERR | ERR | ERR | ERR | ERR | ERR |
| Chartered Accountants | | 20,285 | 16,227 | 2,785 | 1,273 | 94% | 95% | 93% | 95% | 19% | 16% | 64% | 26% |
| Chiropodists | NC | | | | | ERR | ERR | ERR | ERR | ERR | ERR | ERR | ERR |
| Chiropractors | | 1,476 | NA | NA | NA | 76% | 78% | ERR | 64% | ERR | ERR | ERR | ERR |
| Dental Surgeons | | 5,286 | 4,240 | 653 | 393 | 100% | 100% | 100% | 100% | ERR | ERR | ERR | ERR |
| Dental Technicians | | 442 | NA | NA | NA | 30% | ERR | ERR | ERR | ERR | ERR | ERR | ERR |
| Denture Therapists | | 430 | 430 | NA | NA | ERR | 100% | ERR | ERR | ERR | 81% | ERR | ERR |
| Drugless Therapists | | 160 | 101 | 0 | 59 | 88% | ERR | ERR | 88% | ERR | ERR | ERR | ERR |
| Engineers | | NA | NA | NA | NA | ERR | ERR | ERR | ERR | ERR | ERR | ERR | ERR |
| Funeral Directors | NC | | | | | ERR | ERR | ERR | ERR | ERR | ERR | ERR | ERR |
| Insurance Brokers | | 11,799 | NA | NA | NA | 71% | ERR | ERR | ERR | 43% | ERR | ERR | ERR |
| Land Surveyors | NC | | | | | ERR | ERR | ERR | ERR | ERR | ERR | ERR | ERR |
| Lawyers | | NA | NA | NA | NA | ERR | ERR | ERR | ERR | ERR | ERR | ERR | ERR |
| Masseurs | | 900 | 900 | NA | NA | 96% | 100% | 33% | ERR | 69% | 82% | 8% | ERR |
| Nurses | | 103,517 | NA | NA | NA | ERR | ERR | ERR | ERR | ERR | ERR | ERR | ERR |
| Nursing Assistants | | 34,237 | NA | NA | NA | ERR | ERR | ERR | ERR | ERR | ERR | ERR | ERR |
| Ophthalmic Dispensers | | 1,387 | NA | NA | NA | 119% | 121% | 50% | 100% | ERR | ERR | ERR | ERR |
| Optometrists | | NA | NA | NA | NA | ERR | ERR | ERR | ERR | ERR | ERR | ERR | ERR |
| Osteopaths | | NA | NA | NA | 25 | ERR | ERR | ERR | ERR | ERR | ERR | ERR | ERR |
| Pharmacists | | 6,770 | NA | NA | NA | 99% | 99% | 100% | 99% | ERR | ERR | ERR | ERR |
| Physicians and Surgeons | | 23,243 | NA | NA | NA | 69% | ERR | ERR | ERR | 53% | ERR | ERR | ERR |
| Physiotherapists | | 2,902 | 1,724 | 436 | 742 | 100% | 100% | 100% | 99% | ERR | ERR | ERR | 66% |
| Psychologists | | 1,157 | 744 | 99 | 314 | 74% | 68% | 70% | 107% | 24% | ERR | ERR | ERR |
| Radiological Technicians | | 4,508 | 3,646 | 634 | 228 | 629% | 1461% | 317% | 88% | ERR | ERR | ERR | 67% |
| Veterinarians | | 2,344 | 2,031 | 93 | 220 | 95% | 100% | 90% | 80% | 65% | 94% | 71% | 21% |

NOTES: NA/ERR Data not readily available.
NC/ERR Failed to make contact.
(1) Data refer to a previous year, selected by the professional organizations as the most likely time of application for candidates admitted during the most recent year.

Only the total number of current members shows any consistency. Therefore, we may use it as a crude measure to judge the relative number of professionals affected by problems of entry. But these data do not help us to identify problems in differential treatment of foreign-trained professionals.

## 2. Formal requirements for entry to most professions suggest potential barriers

The flowcharts for most professional organizations contain aspects that could appear as barriers to immigrant applicants. We stress that our analysis examines each process for potential barriers on a logical or systemic basis only. It looks for weaknesses in the process that could, but would not necessarily, have a disproportionately negative impact on members of minority and ethnic groups. In most cases, such weaknesses occur as subjective elements in the entry process, rather than objective means of evaluating candidates. The more subjective methods leave scope for interpretation and judgement that allows an opportunity for personal or systematic bias to influence the evaluation of members of minority groups.

The nature of potential barriers varies widely. The following sections discuss the processes followed by the professions and the implications of those processes for applicants who were trained overseas. These processes and a preliminary coding of the characteristics of each profession with respect to each process are shown in Exhibit V-3.

### (a) Basis of review of academic qualifications

Accreditation of schools provides a mechanism that allows a profession to set lower requirements (beyond the academic ones) for certification, or to reject individuals who are not graduates of accredited schools. The process of accreditation can be expected to favour better known schools that are more accessible to Canada. The same general argument applies to an approved

EXHIBIT V-3

| Profession | Basis of Review of Academic Qualifications: Professional Status | Graduate of: Ontario Program Only | Graduate of: Accred. School | Graduate of: Approved School, Program | If Not Graduate of Equivalent Program: Examine by subject | If Not Graduate of Equivalent Program: Retrain | Comprehensive Evaluating Exam | Facility in English or French | Qualifying Exam: Reciprocity | Qualifying Exam: Certification Exam | Qualifying Exam: Clinical Practical Test | Qualifying Exam: Cost | Internship: Required | Internship: Credit Overseas Work | Retraining: Available |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Architect | credit | | | • | ? | ? | ? | English | | 2 courses 2 exams | | ? | 3 years in Canada, 6 mo. in Ontario | no | ? |
| Certified General Accountant | credit | | | • | • | exemptions | | | partial | 2 courses 2 exams (min) | | ? | 2 years, 1 in Canada | yes | |
| Chartered Accountant | credit | | | • | • | exemptions | | | partial | 3 exams (min) | | ? | 3 years | yes | academic |
| Chiropodist | no credit | | | • | | | | | ? | 9 exams | | $100 | 3 months | ? | academic |
| Chiropractor | ? | | • | | | | | | | 8 exams | | max $150 | none | | academic |
| Dental Surgeon | no credit | | US only | any univ. program | | | | • | | yes | US 2 other 3 | US - $2815 other - $3715 +expenses | none | | academic (limited entrants) |
| Dental Technician | no credit | • | | | | | | • | | yes | | ? | 1 year 4 years | no | academic |
| Denture Therapist | no credit | | | • | | | | • | | yes | | $350 | no | | academic |
| Drugless Therapist | possible credit | | | • | | | | exams in English | possible | yes | yes | max $100 | no | | academic |
| Engineer | possible credit | | | • | • | | | | | prof'l practice | | | 2 years, 1 in Canada | yes | academic |
| General Director | possible credit | | | | | | | course in English | | yes | yes | $75 | 1 year | ? | academic |
| Insurance Broker | no credit | • | | | | | | exam in English | | yes | | ? | no | | two week program |
| Land Surveyor | required | | | • | | | | | ? | yes | | | articles | ? | academic |
| Lawyer | no credit | | | • | • | exeinptions | | • | | yes | | $300+ | articles (guaranteed) | no | univ. program |
| Masseur | no credit | • | | | | | | | | 7 exams | yes | ? | no | | academic |
| Nurse Nursing Assistant | required | | | • | | • | | • TOEFL | | yes | | $120 | no | nursing within last 5 years (required) | 22 colleges |
| Opthalmic Dispenser | required | • | | | • | | | | | yes | yes | $100 | 3 years, 1 in Canada | yes | academic |
| Optometrist | credit | | | • | | | | • | | yes | ? | ? | no | | academic |
| Osteopath | MD credit | | all in US | | | | | | | 7 exams MD (US) exempt | ? | max $50 | no | | academic, US only |
| Pharmacist | no credit | | | any univ. program | | | offered | TOEFL + oral exam | | 3 exams | | $200 | 12 months | yes | US, UK, Ireland, Australia |
| Physician Surgeon | no credit | | Canada US only | • | | | • (approved school) | TOEFL | | yes | | ? | 24 places per year | US grads not restricted | academic |
| Physiotherapist | CPA or UK | | | • | | | | TOEFL | UK only | under development | | ? | no | | academic |
| Psychologist | no credit | | • | • | • | | | | | yes | | ? | • | no | academic |
| Radiological Technician | credit | | | • | | | | • | yes | yes | | $40 | • | no | academic |
| Veterinarian | partial credit | | | WHO list | | | | • | | yes | • | ? | no | | academic |

school or program -- the course of study must be known to the Ontario professional body before it can be approved. Graduates of less well known schools or programs may face more demanding entry requirements.

Some professions require professional status. For example a nurse from another country whose professional status is recognized by the College of Nurses of Ontario is admitted to the certification exams. If an individual's qualification is not recognized by the Ontario professional organization, the candidate will have to complete some or all of the Ontario program of study in order to qualify, possibly repeating instruction already taken in another jurisdiction.

Four professions admit only graduates of an Ontario program. If similar training is offered overseas, the immigrant will face duplication of prior training to gain certification in Ontario.

If the candidate does not have a professional status and is not a graduate of an approved/accredited program, some professions will examine the graduate in particular areas of competence, depending on an assessment of the prior training. Such assessments are usually subjective, carried out by a panel that reviews applicants, case by case. Many professions allow retraining opportunities, usually available from universities and colleges. Other professions do not offer retraining programs: the candidate must prepare for the exams without the benefit of an organized course of study.

Evaluating exams are offered to applicants in pharmacy and medicine. These exams provide a more objective means of assessing the academic background of the candidate. They also offer a much less expensive path toward practice.

### b) Facility in English or French

A number of professions require a facility in English or French. Exhibit V-3 notes where those instances that have come to our attention where TOEFL (Test of English as a Foreign Language) is used to assess competence in English.

### (c) Qualifying exam

Candidates in two professions, physiotherapists and radiological technicians, may be admitted by reciprocity of professional status. Applicants holding these qualifications are admitted with fewer tests and in some cases with no qualifying examination. The documentation on land surveyors suggests that reciprocity may also be offered in this profession.

The certification exam is required by most professions. However, MD's from the United States are exempt from an exam as an osteopath and dental surgeons trained in the US are exempt from one clinical exam. In cases such as these, candidates face substantially reduced entry requirements compared to applicants from other countries.

A few professions require a clinical or practical test.

The cost of the qualifying exam typically did not come to our attention. It was raised as an issue by a number of respondents with respect to dental surgeons, for whom the cost is considerably higher than for other professions.

### (d) Internship

A number of professions require an internship. Some give credit for overseas work. Dental technicians require a one year internship for

graduates of an Ontario program and four years for graduates of other programs. Pharmacists trained in the US, UK, Ireland or Australia are given partial credit for their overseas work. Physicians and surgeons trained in the US are not restricted in their access to internship places. Twenty-four places per year are allowed for pre-internship programs for those trained elsewhere in the world (a small number compared to the historical pattern of admission in Ontario.)

The extent to which professions require additional internship or work experience in Ontario creates a potential barrier due to the delay in achieving professional qualification.

### (e) Availability of training

Finally Exhibit V-3 shows the notes we have made on availability of retraining. Few specialized retraining programs are available. From data available to us, it would appear that most retraining amounts to either self directed courses of study or a return to a purely academic program in the company of first-time (e.g., undergraduate) trainees.

## 3. Review of process and requirements for the professions

The following paragraphs note the potential barriers that could exist in the processes leading to entry within each of the studied professions. As noted above, we were unable to obtain responses from some professions with respect to the flowcharts shown in Appendix D. Further, the nature of this project limited our review to a quick summary. Therefore the commentary that follows is not exhaustive. It is intended to suggest the range of entry requirements and potential barriers that may exist, to provide guidance on the nature and scope nature of further work for Phase II.

### (a) Architect

As noted above, the Ontario Association of Architects did not respond to our letter or telephone calls. The formal documentation on

architecture does not clearly indicate whether members of recognized organizations of architects in other jurisdictions are required to take admission courses and to complete experience requirements in Canada. If they are not, the effort required to gain entry to architectural practice could hinge on whether the Ontario Association recognizes the professional organizations in another country.

### (b) Certified General Accountant

Entry requires some courses and examinations even for candidates with recognized professional accounting designations. Formal recognition of other professional accounting associations may affect the number of courses acquired, but challenge exams are available if equivalency is in doubt. Also, the requirement for one year of practical experience in Canada could be viewed as a barrier to entry by a candidate with prior experience in another country. One year of practical experience in Canada is required of all candidates.

### (c) Chartered Accountant

The process to chartered accountancy requires, in addition to membership in a designated accounting body, success in exams on topics specific to practice in Canada: Canadian Taxation and Business Law, on professional conduct and the CICA handbook. The exams are required of all candidates trained outside Canada.

Foreign-trained candidates with less than three years previous public accounting experience must complete a period of prescribed practical experience in Ontario.

### (d) Chiropodist

Entrance requires equivalent training in an approved school or college, successful completion of an entrance exam, and three months' internship

under the supervision of a registered chiropodist, regardless of experience acquired in another jurisdiction.

**(e) Chiropractor**

Candidates must be trained in an accredited school to be admitted to the board examination. No equivalent training is recognized. All chiropractic candidates must complete a board examination, regardless of qualification in another jurisdiction.

**(f) Dental Surgeon**

Any graduate of a university-based dentistry program may write the comprehensive examination. All foreign-trained candidates must successfully complete the comprehensive written and clinical exams of the National Dental Examining Board. Graduates of approved dental programs in the U.S.A., however, are exempt from one part of the exams. The minimum fee for NDEB exams is $2,815 for candidates who trained at an approved dental school in Canada or the United States, or $3,715 for those who trained at some other dental school. In addition to these fees, candidates must also pay their travel to the site of the exams and living expenses (The exams can take up to eight days.) and the travel and living expenses for a patient for the clinical portion of the exams. Candidates who fail the exams must study at a dental school in Ontario, but dental schools are nearly impossible to enter: only a small fraction of applicants are accepted.

**(g) Dental Technician**

All dental technicians, to become registered, must complete both training and work experience in Ontario. The entry process allows no credit for foreign training (beyond high school) or experience.

### (h) Denture Therapist

Only graduates of equivalent programs outside Ontario are admitted to the licensing exams. Foreign-trained candidates receive no credit for or recognition of experience working abroad.

### (i) Drugless Therapist

Only graduates of equivalent programs outside Ontario are admitted to the Board examinations. Foreign-trained candidates receive no credit or recognition for working abroad.

### (j) Engineer

The Academic Requirements Committee and, if appropriate, the Experience Requirements Committee of the Association of Professional Engineers of Ontario review candidates' background to judge what training, examinations, or further experience are needed for certification. A candidate may have to write as many as 24 exams, which are given only in May each year. APEO provides no training or tutorial services to assist candidates in preparing for these exams. The candidate must also have twelve months' working experience in Canada.

### (k) Funeral Director

Because we did not make contact with the Board of Funeral Services, we cannot comment fully on entry to this profession. The Regulations do not state whether or not funeral directors who are licensed and have practised in another jurisdiction must take a licensing exam.

### (l) Insurance Broker

The process exists entirely within Ontario and depends upon an entrance exam. However, the Insurance Brokers Association of Ontario offers a voluntary two-week training course that should allow most people to pass the exam. Therefore, people with previous experience in other jurisdictions should be able to proceed quite readily to become Registered Insurance Brokers in Ontario, provided they have proficiency in English.

### (m) Land Surveyor

Because we did not make contact with the Association of Land Surveyors, we cannot comment fully on its entry process. The regulations do not state whether practice in another jurisdiction entitles foreign-trained applicants to bypass the entrance examination or the term of articles.

### (n) Lawyer

The (federal) Joint Committee on Foreign Accreditation reviews all foreign-trained candidates. The committee assigns additional study and examinations as it deems necessary. Then candidates must successfully complete the Bar Admission Course, including articles. The committee gives little credit for foreign experience and has no formal guidelines for evaluating academic qualifications when deciding on what further study to require of a candidate. Hence the process depends upon the objectivity and consistency of the Joint Committee.

### (o) Masseur

The Board of Directors of Masseurs apparently does not recognize any foreign training or experience. It requires both Ontario training and successful completion of entrance exam. We do not have details on the duration and cost of the required training.

### (p) Nurse or Nursing Assistant

Equivalent training and past experience are considered in the decision to permit candidates to write registration examinations. The college requires originals of registration documents to be sent from overseas before the claimed qualification will be accepted. Assessement of equivalency is subjective. All candidates must write the certification exam.

### (q) Ophthalmic Dispenser

Registration and practice in another country are recognized, but assessment of equivalent courses is subjective. Candidates must still successfully complete board exams and have at least one year of experience in Canada. The Board of Ophthalmic Dispensers points out that many immigrating opticians do not have the training or experience with contact lenses that practice in Ontario requires.

### (r) Optometrist

Comparable academic qualifications or licensed practice in another jurisdiction exempt the candidate from further training, but an entrance exam is still required. Assessment of equivalency is subjective.

### (s) Osteopath

All osteopaths registered in Ontario must have trained in the United States: no programs are offered in Canada. American internship or license to practice medicine eliminate the need for Board examinations. This route seems to be the standard, as the Board has not set exams since 1952.

### (t) Pharmacist

Equivalent degrees are acceptable, as long as the program was offered at the University level. If there is any question about the adequacy of the academic program, candidates can write an evaluating exam set by the Pharmacy Examining Board of Canada (PEBC) to register as a student and be admitted to the qualifying exam. Previous experience could reduce the in-service training required. All candidates must pass the qualifying exam of the Pharmacy Examining Board of Canada and an examination in pharmaceutical jurisprudence and must complete up to twelve months' in-service training. The reduction of in-service training due to working experience applies mainly to candidates trained in the United States, in Great Britian, or in Australia.

### (u) Physician or Surgeon

Only Canadian and American schools are accredited. Candidates from other countries who graduated from an acceptable medical school write an evaluating examination available in centres worldwide. Internship in Ontario is mandatory, but internships are not readily available. The Province recently established pre-internship positions for graduates of acceptable but unaccredited medical schools, guaranteeing an internship positions for the candidates the following year. On completion of the internship, candidates write the qualifying examination set by the Medical Council of Canada. (Note: Federal Immigration officers purportedly inform potential immigrants, before they leave their homelands, that they should hold out no hope whatsoever of pursuing a medical career in Canada. No immigration points are awarded for medical expertise.)

### (v) Physiotherapist

The Board of Directors of Physiotherapy at present relies on the Canadian Physiotherapy Association to assess suitability of a physiotherapist

for registration. The Board will register anyone eligible for membership in the Association upon submission of an application and payment of a fee. We do not have a description of the criteria for determining eligibility. One alternative to eligibility for Association membership, however, is a Diploma in Physiotherapy from the Chartered Society of Physiotherapy of the United Kingdom. The Board is working toward a national examination for all Canadian and non-Canadian candidates.

**(w) Psychologist**

Review by the Ontario Board of Examiners in Psychology can result in a candidate's exemption from the entrance exams and from the internship otherwise required. Academic training at an accredited or approved university counts as equivalent to a Canadian degree.

**(x) Radiological Technician**

Registration in another country under a similar regulation exempts the candidate from an entrance exam. Likewise, successful completion of training under a similar regulation is counted as equivalent to Canadian training. The assessment of equivalency may be subjective.

**(y) Veterinarian**

Candidates must graduate from a veterinary school listed by the World Health Organization. Academic qualifications are judged and accepted based on American standards, mainly according to successful completion of the American Veterinary Medical Association national board examination. In addition, candidates must pass exams on matters relevant to practice in Ontario (reportable diseases, jurisprudence, etc.) and, if coming from a country other than the U.S.A., an exam of clinical proficiency.

## 4. Analysis of entry processes indicates general sources of problems

The five issues noted above give rise to certain problems in the entry process. Exhibit V-3 shows how each profession under study behaves with each of the issues. We now discuss each issue in turn.

### a) Few professions offer an impartial assessment of academic qualifications

Most professions review the academic qualifications of foreign-trained applicants case-by-case. Some refer to lists of universities maintained by international organizations such as the World Health Organization, but recognize that such lists do not necessarily imply academic merit. Typically, member countries simply identify universities that meet general criteria for being on the list, such as having been in operation for at least ten years. Some professional organizations use an entry or evaluating examination that can readily be taken to demonstrate academic equivalency to Canadian programs. In some cases, the exam may even be taken in the immigrant's home country.

Most of the evaluation of foreign training is done subjectively. Some professional organizations use objective evaluating exams -- the number of evaluating exams among the professions seems to be increasing. We encountered no comprehensive inventory of programs with current assessments of equivalences.

The majority of professional organizations rely on a variety of subjective methods including case-by-case review of documents, personal interviews, correspondence with schools and certifying bodies overseas. These methods often consume significant resources. They have been the subject of numerous appeals by candidates. In general, the process is vulnerable to bias. We do not mean to imply that discrimination occurs broadly. But we conclude from our study that the evaluation of academic credentials takes place largely in the absence of objective controls or a systematic external review of validity.

Some professional organizations permit holders of professional designations or licenses in other jurisdictions either direct entry to practice in Ontario or direct access to an entrance examination. This approach eliminates the need to assess many academic programs for equivalency, thus reducing somewhat the subjectivity in determining equivalency.

**b) Most professions give little credit for work experience**

Most of the professional organizations that require internship or clinical experience are willing to give some credit for experience obtained in another country. This holds especially where a licence is required in the other jurisdiction. But such professional organizations still require some experience to be accumulated in Canada or in Ontario before granting full admission to the profession. Practice varies widely on the amount of exemption allowed for experience in a given country.

Professional organizations that do not require any specific work experience usually do not give credit for experience abroad when judging the examination or upgrading requirements of a foreign-trained candidate. These professional organizations tend to rely exclusively on academic requirements and to fall in the category of professions characterised by private practice.

**c) Language proficiency required for examinations may not match that required for practice**

Professions requiring proficiency in English (or in either English or French) may require demonstration of a proficiency that is not adequate to ensure smooth entry to the profession. Many professional organizations rely on the Test of English as a Foreign Language (TOEFL) to assess English proficiency (and similar tests for French). They tend to require certain minimum passing grades on these tests, as considered appropriate for practice. However it is not clear that the aspects of language tested by the TOEFL are important to the

practices of a professional in Ontario. On the other hand, the proficiency required to attain these grades does not necessarily meet the needs of the applicant as far as studying and passing exams are concerned.

In most cases, the proficiency requirements stated in the Acts or Regulations are too vague to determine the extent of this problem. The issue here is that the entry processes in some professions might over-emphasize the fine points of grammar and style while failing to examine the command of the technical language of the profession.

**d) Suitable retraining opportunities are few**

Most professions rely on academic institutions to train their applicants. Therefore, if an immigrant with insufficient academic qualifications applies for membership, the professional organization involved will usually require the applicant to return to school. In addition to the language issue just discussed, this path can create barriers because typically the applicants have left the academic environment long behind. They are not used to lectures, examinations, and being surrounded by younger students who are totally new to the field. This path gives little credit for the general and applied knowledge the applicant has likely acquired over may years of practice in another country.

**(e) Access to internship is difficult to assess**

Many professional organizations require some forms of internship, in-service training, or supervised experience. It is not clear whether the profession feels an obligation to provide such experience. (Law is one exception that has come to our attention: current members of the Law Society are strongly encouraged to provide positions for articling students.) In some cases, notably medicine, internships are very difficult to secure. In medicine, government policy limits the number of pre-internships for foreign-trained applicants to 24. In other professions, pharmacy for example, student working experience seems readily available.

## C. ANALYSIS OF FORMAL COMPLAINTS TO ADJUDICATIVE BODIES

Our mandate includes the identification of practices or conditions that appear to create barriers for candidates whose qualifications were received outside Canada. We begin our examination with a review of formal complaints heard by the following adjudicative bodies:

- Ontario Human Rights Commission
- Health Disciplines Board
- Supreme Court of Ontario Divisional Court

Most of the formal complaints we studied showed some problems with consistent application of the Act and Regulations. In many cases the problems arose due to inappropriate interpretations used to establish policy for applying the Regulations. Courts have ruled that a policy developed by a professional organization does not constitute a sufficient basis for restricting entry to the profession further than is stipulated in the Acts and Regulations. (The limit of three failures of the registration examination in nursing has caused a particularly large number of complaints in this regard.)

Exhibit V-4 summarizes the complaints we studied. These complaints arose over the period roughly from 1982 to date. They are not exhaustive of all such cases. The adjudicative bodies' records do not state the complainants' ethnicity, thus making it difficult to ensure a complete selection of cases relevant to our study.

The records of decision do not note ethnicity of the complainant or whether a given complaint was relevant to a particular minority group. For example, with regard to the Health Disciplines Board, many of the complaints were expressed simply as "dissatisfaction with the decision", referring to earlier decisions reached by registration committees of professional organizations. We find it difficult to interpret whether or not such complaints are based on entry barriers that work to the disadvantage of minority groups.

EXHIBIT V-4 Summary of formal complaints against professional organizations (Page 1 of 3)

| COMPLAINT | PROFESSIONAL ORGANIZATION | OUTCOME |
|---|---|---|
| ONTARIO HUMAN RIGHTS COMMISSION | | |
| Academic qualifications and work experience not recognized | Association of Professional Engineers of Ontario | Resolved when complainant passed exam |
| Academic qualifications and work experience not recognized | Association of Professional Engineers of Ontario | Commission did not want to set up inquiry |
| Academic qualifications not recognized | Association of Professional Engineers of Ontario | Unsure: possibly abandoned by complainant |
| Academic qualifications not recognized | Ontario Association of Architects | Dismissed: complainant's qualifications inferior to others admitted from same university |
| Questioned failure of exams | Association of Professional Engineers of Ontario | Complainant was later admitted to practice |
| Academic qualifications and work experience not recognized | Association of Professional Engineers of Ontario | No board of inquiry set up, but APEO could provide no data on accepted or rejected applicants by age, sex, ethnicity, etc. |
| Inconsistent assessments of academic qualifications | Association of Professional Engineers of Ontario | Found no evidence of discrimination |
| Licence delayed | College of Nurses of Ontario | Getting papers from Zimbabwe caused delay: complainant treated fairly |
| HEALTH DISCIPLINES BOARD | | |
| Experience ineligible for exemption from some of the upgrading program and refused opportunity to rewrite exam after 3rd failure | College of Nurses of Ontario | Decision of Registration Committee upheld |
| Declared ineligible to write registration exam | College of Nurses of Ontario | Referred to Registration Committee for new decision |
| Unacceptable conditions required for renewal of RNA registration | College of Nurses of Ontario | Decision of Registration Committee overruled: registration required |
| Declared ineligible to write registration exam | College of Nurses of Ontario | Decision of Registration Committee upheld |
| Professional experience not recognized in determining exemption from internship and access to status as a MCC Licentiate or NBME Diplomate | College of Physicians and Surgeons of Ontario | Returned to Registration Committee Committee, recommending a reduction in internship required |
| Professional experience not recognized in determining exemption from internship and access to status as a MCC Licentiate or NBME Diplomate | College of Physicians and Surgeons of Ontario | Returned to Registration Committee recommending exemption from internship and licensing |
| Unreasonable requirement for in-service training, since complainant was fully employed | Ontario College of Pharmacists | Exemption from further in-service training upheld |
| Unfair consideration given to evidence of unsafe practice as a nursing assistant | College of Nurses of Ontario | Decision of Registration Committee overruled: registration required |

EXHIBIT V-4 Summary of formal complaints against professional organizations (Page 2 of 3)

| COMPLAINT | PROFESSIONAL ORGANIZATION | OUTCOME |
|---|---|---|
| Two failures over six years ago is insufficient basis for being ruled ineligible to re-write examination | College of Nurses of Ontario | Decision of Registration Committee upheld |
| Unfair application refusal due to hearing deficiency | Ontario College of Pharmacists | Returned to Registration Committee recommending arrangements for the accomodation of the hearing disability during the examination |
| Three examination failures is insufficient basis for being ruled ineligible to re-write examination | College of Nurses of Ontario | Decision of Registration Committee overruled: registration required |
| Low examination score is insufficient basis for being ruled ineligible to re-write examination | College of Nurses of Ontario | Decision of Registration Committee upheld |
| Previous training and experience not fully recognized in decision requiring total upgrading program | College of Nurses of Ontario | Decision of Registration Committee upheld |
| Unfair consideration given to lack of internship and to conviction of fraud | College of Physicians and Surgeons of Ontario | Decision of Registration Committee upheld |
| Pre-registration training performance was not fully recognized | College of Physicians and Surgeons of Ontario | Returned to Registration Committee in light of further evidence |
| Physical problem not sufficent basis for refusal to license | Royal College of Dental Surgeons of Ontario | Decision of Registration Committee overruled: registration required |
| Suspension of licence in 1974 not sufficient basis for requiring further internship | College of Physicians and Surgeons of Ontario | Decision of Registration Committee upheld |
| Previous experience not considered in refusing Enabling Certificate | College of Physicians and Surgeons of Ontario | Decision of Registration Committee upheld with recommendation to issue an Educational Licence |
| Lack of evidence of safe practice and failure of CNATS examination insufficient basis for being ruled ineligible to re-write examination | College of Nurses of Ontario | Decision of Registration Committee upheld |
| Pass on practice exam in New York State should permit issue of Enabling Certificate | College of Physicians and Surgeons of Ontario | Decision of Registration Committee upheld |
| TOEFL scores misrepresent fluency in English | Ontario College of Pharmacists | Decision of Registration Committee upheld |
| Shortage of clinical practice and lack of evidence of safe practice insufficient basis for refusing licence | College of Nurses of Ontario | Decision of Registration Committee upheld |
| Internship spread over 24 months should meet licence requirement | College of Physicians and Surgeons of Ontario | Returned to Registration Committee for further consideration |
| Failure of midwifery exam insufficient basis for being ruled ineligible to re-write examination | College of Nurses of Ontario | Decision of Registration Committee upheld |
| Shortage of lecture hours not sufficient basis for requiring an assessment period | College of Nurses of Ontario | Decision of Registration Committee upheld |
| Shortage of pre-registration training not sufficient basis for refusing licence | College of Physicians and Surgeons of Ontario | Decision of Registration Committee upheld |

EXHIBIT V-4 Summary of formal complaints against professional organizations (Page 3 of 3)

| COMPLAINT | PROFESSIONAL ORGANIZATION | OUTCOME |
|---|---|---|
| Question Committee's right to deny credit for training despite irregularities | Ontario College of Pharmacists | Decision of Registration Committee upheld |
| Three examination failures is insufficient basis for being ruled ineligible to re-write examination | College of Nurses of Ontario | Decision of Registration Committee upheld |
| Refusal to issue a general licence unfair in light of intended use to obtain job as a Medical Officer of Health, which does not require medical practice | College of Physicians and Surgeons of Ontario | Returned to Registration Committee for further consideration, with recommendation to issue a restricted licence |
| Unfair disqualification of training taken abroad | College of Physicians and Surgeons of Ontario | Returned to Registration Committee for further consideration |
| SUPREME COURT OF ONTARIO, DIVISIONAL COURT | | |
| Invalid expiration of temporary licence | College of Physicians and Surgeons of Ontario | Decision of Registration Committee upheld, but with split decision |

The cases heard by the Ontario Human Rights Commission did not offer straightforward examples relevant to this study. The Human Rights Commission cases reveal some problems that might relate to entry barriers. Some cases resulted in decisions of no discrimination. Others seemed to solve themselves in the sense that the complainant failed to pursue the case, sometimes because the cause for complaint was removed. For example, one complainant passed an exam set by the Association of Professional Engineers of Ontario and was no longer concerned about the lack of recognition of academic and practical experience. Such cases could indicate success in spite of a barrier. But evidence is too sparse for developing anything more than a conjecture.

We note that the formality of bringing a complaint before an adjudicative body, may constitute a barrier to entry as well. If such a complaint becomes necessary for a candidate to ensure his or her rights, the complaint process should be readily accessible. Formal expression of dissatisfaction due to perceived unfairness will maintain a necessary balance in the entry processes for professions. Immigrants should be encouraged to pursue other means of resolving problems first. But in the absence of a satisfactory resolution, they should feel free to make a formal complaint.

## D. ANALYSIS OF SUMMARY DATA ON THREE PROFESSIONS

Summary data by gender was provided by three professional organizations -- the Institute of Chartered Accountants, the Ontario Board of Examiners in Psychology, and the Board of Directors of Physiotherapy. As displayed in Exhibit V-5, the data show some differences but none are statistically significant. The data indicated that female applicants have become licensed or registered at either the same or a better rate compared to males. Among foreign-trained applicants, females fared a little better than males in the male-dominant chartered accounting profession, while the males did better in the

EXHIBIT V-5 Summary statistics for selected professions, by gender

| | | NUMBER OF CURRENT MEMBERS | | | | NUMBER ADMITTED MOST RECENT YEAR | | | | NUMBER APPLIED FOR ADMISSION | | | | SUCCESS RATE FOR APPLICANTS | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Total | Ontario | Other Canada | Other Country | Total | Ontario | Other Canada | Other Country | Total | Ontario | Other Canada | Other Country | Total | Ontario | Other Canada | Other Country |
| Chartered Accountant | T | 20,285 | 16,227 | 2,785 | 1,273 | 1,039 | 782 | 221 | 36 | 1,100 | 825 | 237 | 38 | 94% | 95% | 93% | 95% |
| | M | 17,965 | 14,166 | 2,567 | 1,232 | 720 | 504 | 182 | 34 | 771 | 537 | 198 | 36 | 93% | 94% | 92% | 94% |
| | F | 2,320 | 2,061 | 218 | 41 | 319 | 278 | 39 | 2 | 329 | 288 | 39 | 2 | 97% | 97% | 100% | 100% |
| Physiotherapists | T | 2,902 | 1,724 | 436 | 742 | 278 | 137 | 68 | 73 | 279 | 137 | 68 | 74 | 100% | 100% | 100% | 99% |
| (1) | M | 293 | NA | NA | NA | 29 | 15 | 4 | 10 | 29 | 15 | 4 | 10 | 100% | 100% | 100% | 100% |
| | F | 2,609 | NA | NA | NA | 249 | 122 | 64 | 63 | 250 | 122 | 64 | 64 | 100% | 100% | 100% | 98% |
| Psychologists | T | 1,157 | 744 | 99 | 314 | 78 | 48 | 14 | 16 | 106 | 71 | 20 | 15 | 74% | 68% | 70% | 107% |
| (2)(3) | M | 734 | 459 | 65 | 210 | 40 | NA | NA | NA | 59 | NA | NA | NA | 68% | NA | NA | NA |
| | F | 423 | 285 | 34 | 104 | 38 | NA | NA | NA | 47 | NA | NA | NA | 81% | NA | NA | NA |

Notes: (1) "Current members" counts only those currently practising.
(2) "Current members" counts only those who responded to a membership survey.
(3) "Number admitted" counts only those with permanent registration.
NA Not available

female-dominated field of physiotherapy. While these data suggest possible gender-balancing trends in these two professions, we must stress that none of the differences mentioned here is statistically significant: the overall rates should be taken as equal for males and females.

## E. ANALYSIS OF DATA ON INDIVIDUAL APPLICANTS

Only three professions -- the Ontario College of Pharmacy, the Ontario College of Nurses, and the Association of Professional Engineers -- provided data on individual applicants. The detailed data we collected on individual foreign-trained applicants to these three professional organizations provide a closer look at potential effects of entry barriers. The data indicate where some differences exist in the rate of success of applicants or, for those who do qualify, how long it took them to do so. The three professions examined here are pharmacy, nursing, and engineering.

### 1. Success of pharmacy applicants is related to gender and country of training

The responsibility for licensing pharmacists for practice rests with the Ontario College of Pharmacists. Details of the entry process appear in the flowchart for entry into practice as a Pharmacist, shown in Appendix D. The main features of the requirements for licensure of foreign-trained applicants are as follows:

- The College uses an evaluating examination, administered by the Pharmacy Examining Board of Canada (PEBC) to assess comparability of the program of study relative to known academic programs, thereby avoiding the problems of interpreting the value or relevance of foreign training or practice. The exam consists of about 300 multiple-choice questions, covering the national curriculum in about the same distribution

by subject area. The PEBC admits candidates to this exam from almost any university-based pharmacy program. Those who fail to gain admittance are usually graduates of shorter technical programs, not equal to a university degree. Their only remaining option is to get the degree. (Space can be quite limited in the pharmacy program at the University of Toronto, the only such program in Ontario.)

- All prospective pharmacists must successfully complete both the PEBC qualifying exam (different from the evaluating exam in that it is practice oriented and tests ability to apply knowledge) and an exam in pharmaceutical jurisprudence. The College may require some upgrading training and exams before allowing a candidate to write the PEBC qualifying exam. While access to the full pharmacy degree program may be difficult, this is less of a problem for specialist or upgrading training.

- Candidates must successfully complete 12 months' in-service training, under the supervision of a licensed pharmacist. Relevant experience in another jurisdiction can qualify for credit toward this requirement. Experience in the United States, Great Britian, Ireland, or Australia reduces the duration of in-service training in Ontario. The College notes that candidates have no difficulty in finding such employment.

- The College also requires reasonable fluency in English or French (as demonstrated on TOEFL and an oral prescription exam). The in-service training provides an effective opportunity for candidates not only to practise day-to-day language skills but also to acquire the necessary technical vocabulary.

Beyond the basic data requested from all the professional organizations, the Ontario College of Pharmacists provided us with access to files on 155 applicants trained abroad. Our staff captured relevant data items from the files, using data entry forms. The captured data were then entered into the computer. Of the 155 applicants, 54 became Registered Pharmacy Students. The College allows each student a fixed period of time to complete the requirements for licensure. The amount of time usually varies between two and four years, depending upon the expected effort required to attain the specified level of language proficiency. The 54 cases represent all registrations scheduled to expire in 1986. The remaining 101 cases represent inquiries at the College

during 1983, or about the time as the 54 students would have first contacted the College.

The data reveal that Registered Pharmacy Students become licensed pharmacists. Of the 54 students we studied, six have not yet received licenses. In most cases, the College has had little contact with the students. But we can put together the following synopsis of each case:

- Returned to U.S. to complete D.Pharm. degree, may return to Ontario.
- Never finished in-service training, College has had no contact.
- Left Ontario to help family in British Columbia, plans to return this year for PEBC.
- Completed training and jurisprudence exam, but no contact since.
- Started working on training, but no further contact -- possibly used the College's list of in-service training positions just to get a job.
- Started training in 1971 and has retained training job ever since.

More detailed statistical analysis reveals that some students tend to progress more quickly than others. We used multiple linear regression to determine the extent to which age, sex, and country of education in pharmacy might be related to the duration of various parts of the licensure process. Our findings represent general conditions only to the extent that the people for whom we collected data typify the flow of aspiring pharmacists through the process. The following represent statistically significant conclusions for the number of cases available for analysis:

- Younger students (under 30 years of age) take longer to succeed at the PEBC qualifying exam, after registration as Students.

- The time from registration to licensure is about seven months less for males than for females, other factors held equal. This time is strongly influenced by the time taken to complete successfully the PEBC exam.

- Students trained in the United States and the United Kingdom require about 11 and 24 fewer weeks of in-service training, respectively, than those trained in all other foreign countries combined.

The College's requirements allow for up to 24 weeks' credit for in-service training for applicants with experience or a licence in the United States, the United Kingdom, Australia, or Ireland, thus accounting for the observed country-based difference. Available data offer no explanation for the causes of the differences related to age and sex. Conclusive analysis of these issues would entail a survey of the individuals involved to examine their reasons for taking the time they did to complete the requirements. In general, however, the basic nature of the process would indicate that the rates of progress and of ultimate success in becoming licensed depend primarily on:

- Prior training and experience.

- Exam-writing skills.

- Proficiency in English or French.

We compared students with people who inquired at the College to look for signs of possible barriers to becoming a student. Our comparison examines differences between the two groups according to: gender, country where previously licensed, and country where educated. These are only data the College collects on enquirers that are relevant to our study. We found a significantly higher proportion of females among students (57%) than among enquirers (39%). We conclude that females are more likely than males to proceed to register. Applicants from the United Kingdom made up 27% of enquirers, but only 11% of students. Applicants from the United States, on the other hand, had a higher proportion among students (26%) than among enquirers

(17%). These differences achieved statistical significance and raise questions as to why they exist.

## 2. Nursing applicants encounter language problems in gaining access to practice

Language and access to the examination process form the two main barriers to entry into nursing practice in Ontario. This section examines the problems associated with them.

### (a) Entry process

We begin with a review of the formal entry process for nursing. The main requirements for foreign-trained applicants are:

- Equivalent nursing education in another jurisdiction.
- Current license or registration in another jurisdiction.
- Employment as a nurse within the past five years.
- Fluency in English or French (TOEFL score of 500).
- Successful completion of the registration examination.

If the nursing training occurred in a country or institution where English or French was not the main language, the applicant must take the TOEFL or the French equivalent.

The published materials available from the College and our interviews with College staff indicate that access to registration examinations could prove problematic. Applicants who immigrate, as refugees for example, with little or no documentation of their formal training or of previous registrations may be denied immediate access to the examination. The College attempts to acquire further information on which to judge equivalency subjectively , but does not offer an objective 'evaluative' examination.

If the required information is not available, the College usually asks that the candidate write the TOEFL, if appropriate, and take the Registered Nursing Assistant (RNA) exam instead. This approach establishes a work program for the candidate and allows a period during which the candidate's practice could be assessed to indicate capability appropriate for admission to the Registered Nurse (RN) exam. But it also could delay considerably the candidate's registration as a nurse.

Candidates whose academic qualifications are not judged equivalent to the Ontario training program must take a retraining program before writing the registration exam. Some candidates who have not worked recently request such training. Candidates who have completed the retraining program are more likely to pass the examination. Access to such training is usually good, through the nearest community college, for instance. The program offers the following benefits:

- Classes are made up of peers rather than young students just out of high school.
- Participants can work as a "graduate" nurse or nursing assistant while training.
- Some courses are offered at night, facilitating work arrangements.
- Financial support can often be obtained from immigrant community associations, from Employment and Immigration Canada, or from the Ontario Student Assistance Program (OSAP).

College policy limits candidates to three failures of the registration examination. After three failures, candidates have the option of becoming nursing assistants or of taking further academic training. However, our review of formal complaints suggests that this policy may not hold up under law.

We next look at rates of success on Registration Examinations for nurses and nursing assistants, based on actual data. The rates, provided by the College, pertain to exams written in 1985. Exhibit V-6 shows significantly higher failure rates for candidates from outside Ontario.

**EXHIBIT V-6 Failure rates on Registration Exams, by location of applicant's training**

| | Nurse | | Nursing Assistant | |
|---|---|---|---|---|
| | 1st Write | Re-write | 1st Write | Re-write |
| Ontario | 8% | 26% | 8% | 41% |
| Elsewhere | 43% | 53% | 44% | 59% |

(Source: College of Nurses of Ontario, Pre-Registration Section, Annual Report - 1985)

These differences beg further investigation. The 'elsewhere' category in the above exhibit includes applicants trained elsewhere in Canada as well as those from other countries, in a mixture of unknown proportions. Nonetheless, we cannot overlook the potential for serious problems for applicants trained outside Canada.

We pursued these general issues using detailed data on individual inquiries, applicants, and registrants from other countries. The data were drawn from files made available to us by the College of Nurses of Ontario. So little information was available from inquirer's files that we could not develop any worthwhile analysis. We sampled files on applicants who had paid their evaluation fees in 1985 and files on registrants who had paid their evaluation fees in 1985. The sampling rates and resulting number of files used are as follows:

- Evaluation fees paid: 80 files drawn from 240 files available (a one-third sample).
- Registration: 79 files drawn from 159 files available (a 50% sample).

We pursued these issues using detailed data on individual enquirers, applicants, and registrants trained abroad. The College gave us access to data on 159 applicants from 1985, 79 of which have since become registered. These numbers include 12 people who applied as RNA's, none of whom has become registered. Among these applicants, we find the differences shown in Exhibit V-7 to be significant.

**EXHIBIT V-7 Rate of registration and time required to register, for nurses**

| Characteristics | % Registered | Average Time Taken |
|---|---|---|
| Trained in U.S.A. | 73% | 9.5 months |
| Trained elsewhere | 41% | 13.3 months |
| Registered in U.S.A. | 74% | 9.7 months |
| Registered elsewhere | 40% | 13.5 months |
| Speaks language other than English or French | 36% | 17.6 months |
| Speaks only English or French | 58% | 10.2 months |
| Required to take TOEFL | 27% | 18.4 months |
| Not required to take TOEFL | 58% | 11.6 months |

They strongly suggest that immigrants from countries where the dominant language is other than English or French (especially from countries other than the United States) will encounter greater difficulty in becoming registered in Ontario than will other applicants.

### 3. Number of exams required of engineers depends mainly on undergraduate training

The process of entry to the engineering profession presents several mechanisms that could be vulnerable to discrimination. The process consists of two similar streams -- one for academic qualifications and one for experience, followed by a Professional Practice Examination for all candidates.

#### (a) Academic requirements

The Academic Requirements Committee (ARC) of the Association of Professional Engineers of Ontario (APEO) reviews an applicant's academic qualifications based on a review of documentation and occasional personal interviews of candidates (sometimes using a translator) to assess training overseas. It may require the applicant to prepare for and to pass up to 24 exams. The number and type of examinations assigned will depend on a subjective assessment of the individual's academic achievements to the date of the evaluation.

#### (b) Experience

The Experience Requirements Committee (ERC) of APEO reviews the candidate's experience. In some cases, the review can lead to exemption from some examinations. To this end, the ARC and ERC work in concert to evaluate an applicant's qualifications. The ERC may require an individual to gain further working experience. Again, the process is subjective.

#### (c) Analysis

Further study relied upon data we extracted from the Association's files. We began with a list of file numbers for people who had applied in 1985 and been referred to the ARC for review. This group included both foreign-

trained applicants and those who had graduated from Canadian community colleges and technical schools. APEO did not know the proportion of these groups within this list. Aiming for about 100 files on which to conduct analysis, we sampled two out of three files and located 104 belonging to people trained abroad. Of these, 26 have since registered as professional engineers: we do not know whether the remainder have given up or are still working toward registration. This low rate reveals a flaw in our data collection strategy. Advice from APEO indicated that most 1985 applicants would have registered by now. Clearly such is not the case.

We looked at the number of examinations required of foreign-trained applicants as a measure of difficulty of entry to the profession. The number of exams required was statistically related only to the characteristics of the undergraduate degree obtained. Significantly fewer exams were required of:

- Holders of the BSc degree.
- Specialists in civil engineering.
- People who graduated before 1970.

The data suggest that the APEO is granting exemptions from exams based on work experience. Unfortunately, the data we obtained could not readily permit us to identify the country where each applicant trained. This factor could be closely related to the type of degree a candidate might possess. Nor could we readily extract comparable statistics for Canadian-trained applicants as a comparison. Whether a particular disadvantage exists for foreign-trained applicants depends on how closely country of training is related to the characteristics of undergraduate training noted above.

Further data would be required from APEO in order to pursue the matter -- data on Canadian-trained applicants in particular. Applicants who do not speak English will have greater difficulty becoming engineers in Ontario.

Such applicants must train for and write exams in English. Those who wish to take lecture courses in preparation for the exams may find themselves trying to pursue essentially a retraining program alongside undergraduate students.

VI

# ACCESS TO TRADES IN ONTARIO

## A. INTRODUCTION

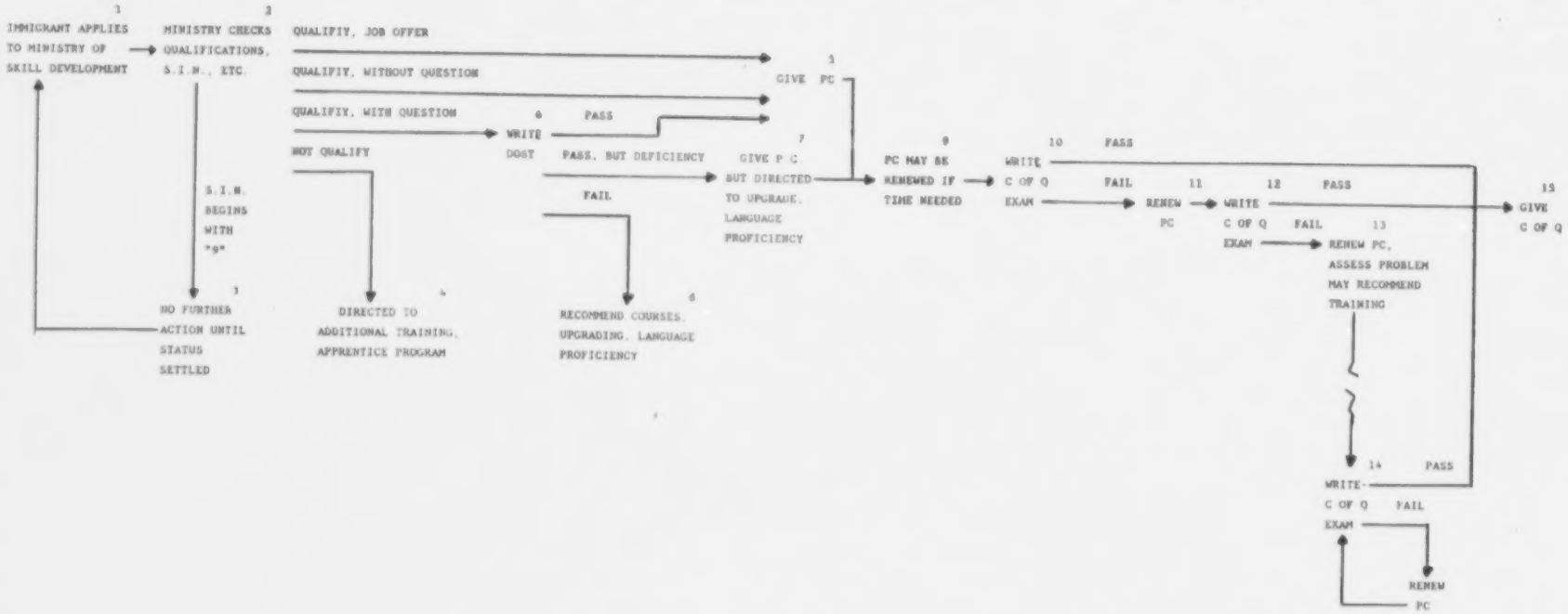
This section investigates access to trades in Ontario by persons who have obtained their qualifications abroad. We should note a distinction between the two types of regulated trades in Ontario -- mandatory and voluntary trades. A mandatory trade requires a certificate, attesting to the qualifications of the individual, before a person can work in the trade as a journeymen. Voluntary trades require no such certification as a prerequisite to work.

## B. ACCESS TO MANDATORY TRADES

Certificates are issued for mandatory trades by the Ministry of Skill Development. Exhibit VI-1 presents the steps in this process. Numbers cross-reference to the Exhibit.

- An immigrant applies to the Ministry of Skills Development (1).
- The Ministry checks the application (2). This involves a determination of the status of the immigrant. A valid social insurance number (SIN) is required. A SIN with a "9" as the first digit signifies that the individual is not yet a landed immigrant. In such a case the Ministry must await a determination of the individual's status before further action is taken. This will result in the non-landed immigrant being unable to obtain employment in a mandatory trade until his status is determined. (3). Qualifications are also checked. This involves a review of (translated) documents from the immigrant. If no documents are available, which may be the case for someone claiming refugee status, a sworn affidavit will

EXHIBIT VI - 1 Procedure for entry into trades by those with qualifications from another jurisdiction



be accepted in lieu. The review of documentation is assisted by a resource document prepared by Registrar Services, Management of Information Systems Branch, Ministry of Education. The document lists the training and experience requirements for skilled trades in a large number of countries. This document can be used to help assess the equivalence of the immigrant's qualification with the requirements for the trade in Ontario.

If the number of years in the trade fall short of those required for apprenticeship in the trade in Ontario or if the individual's training is felt to fall short of the requirements the individual is referred to apprenticeship training or upgrading training (4). If formal training is required an individual may first have to take English language training.

Other possibilities may result from the review:

- The individual is found to be qualified and already has a job offer.

- The individual is found to be qualified and there is no question by the staff doing the review.

- The individual appears to be qualified but there remain questions by the staff doing the review.

▶ In the cases where the individual qualifies and a job offer awaits, or there is no question, a Provisional Certificate (PC) is issued (5). The PC provides a temporary certificate which allows the immigrant to work in the trade.

▶ If a question exists concerning the qualification of the individual a Demonstration of Skills Test (DOST) will be required (6). The test is a practical examination of skills required by a fully qualified worker (journeyman) in the trade. The DOST is available for all mandatory trades. It is available in up to 20 languages for the following trades (see Exhibit VI-2):

- Electrician.

- Motor vehicle mechanic.

- Plumber.

- Steamfitter.

- Sheet metal worker.

**EXHIBIT V-2 Languages available for Demonstration of Skills Test**

| Languages Available | Electrician | Motor Vehicle Mechanic | Plumber | Steamfitter | Sheet Metal Worker |
|---|---|---|---|---|---|
| Arabic | X | X | X | X | X |
| Chinese | X | X | X | X | X |
| Czechoslovakian | X | X | X | X | X |
| Danish | X | X | | X | X |
| Dutch | X | X | | X | |
| English | X | X | X | X | X |
| French | X | X | X | X | X |
| Finnish | X | X | | X | |
| German | X | X | X | X | X |
| Greek | X | X | X | X | X |
| Hebrew | | X | | | |
| Hungarian | X | X | X | X | X |
| Italian | X | X | X | X | X |
| Japanese | X | X | | X | |
| Korean | | X | | X | |
| Polish | X | X | | X | |
| Portuguese | X | X | X | | X |
| Russian | X | X | | | |
| Spanish | X | X | X | X | X |
| Swedish | X | X | | X | |
| Yugoslavian (Serbo-Croatian) | X | X | X | X | X |

A nominal fee ($15) is charged to the immigrant. In the case of a non-landed immigrant[1] the full cost of the test is charged (approximately $60). Sometimes an immigration lawyer may request that a client be given a DOST to demonstrate the client's skill level to Employment and Immigration Canada. Three possibilities exist for the immigrant who writes a DOST:

- If the individual passes the DOST and no deficiencies are evident, a Provisional Certificate (PC) is issued (5).

- If a pass is obtained on the DOST but there are obvious deficiencies noted in the individual's training or experience a PC will be issued but the individual is directed toward upgrading training (7). Based on the performance on the DOST, such training may be needed before the individual is able to pass his Certificate of Qualifications (C of Q) exam (10).

- If the immigrant fails the DOST he/she may be directed toward upgrading courses, language proficiency courses or other forms of training (8).

► The Provisional Certificate is issued for a period of up to three months or until the next scheduled Certificate of Qualification examination, whichever is less. If the individual needs more time to prepare for this exam, for example if he/she is receiving upgrading training or English language training, the PC may be renewed (9). The basic philosophy behind the PC is that the skilled immigrant will need time to prepare for the C of Q exam:

- The practices and "jargon" of the trade in Ontario may differ from those in the jurisdiction of the immigrant.

- The immigrant may need to pick up certain skills that were not used in the trade in the foreign jurisdiction.

- The immigrant may need to become more proficient in the English language.

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[1]"Non-landed immigrant" is a generic term used at the Ministry of Skills Development to describe all immigrants who have not yet achieved status as permanent residents.

- The immigrant will then write the Certificate of Qualification examination (10) along with apprentices who seek journeymen status in the trade. Often the exam is common across provinces of Canada. The exam is written in English. An interpreter may be used if the individual has difficulties with the English language. The interpreter cannot be experienced in the trade and cannot have interpreted for the same exam within a year. This is to safeguard that it is the skills of the immigrant being tested. Additional time may also be granted for the immigrant who has a language difficulty. Two possibilities exist:

  - If the immigrant passes the C of Q exam a certificate is issued (15).

  - If the immigrant fails to pass the exam the Provisional Certificate will be renewed (11). The immigrant may then rewrite the C of Q exam after 90 days (12) and if successful will be issued a C of Q (15). If the immigrant fails the second exam (13) the PC is extended and a counsellor tries to assess the problem encountered by the immigrant. Training may be recommended. The immigrant then may write a third C of Q exam (14) after 6 months. If successful a C of Q is issued (15). If unsuccessful, the PC is renewed and the immigrant is given an opportunity to again write a C of Q exam (12). This cycle continues until the immigrant successfully completes his exam and a C of Q is issued (15).

The immigrant may fail to continue at any stage in the process to obtain a Certificate of Qualification.

The process for an immigrant seeking entrance to the trade in Ontario is identical to that for someone from another province seeking entrance. However, often the potential out-of-province applicant is only seeking a Provisional Certificate to work for a short period in the trade in Ontario. As a consequence, the applicant may never attempt a Certificate of Qualification exam. Another possible difference for out-of-province applicants is a result of reciprocal arrangements between the provinces. For some trades for some provinces a trades person may write a special "Red Seal" exam beyond the C of Q exam. If successful, this additional qualification provides access to the trade in all other provinces without further examination.

## C. ACCESS TO VOLUNTARY TRADES

Voluntary trades do not necessarily need a Certificate of Qualification. An immigrant, trained abroad, may obtain access to the trade in Ontario without review of qualifications or additional exams. However, there may be cases where an immigrant will ask for a Certificate of Qualification in a voluntary trade:

- Some jobs may require a C of Q:
  - The union agreement with an employer may specify that employees must have a C of Q.
  - Any employer may require a C of Q.
  - Some contracts may specify that workers have a C of Q for example, painting contracts with the Toronto Board of Education.
- An immigrant may wish a C of Q so that he/she stands a better chance of employment. The C of Q provides a measure of the immigrant's qualifications that may be used by the prospective employer.

The procedures to obtain a C of Q in a voluntary trade are identical to those for a mandatory trade except that no Demonstration of Skills Test exists for a voluntary trade. Again procedures do not vary for those trained in a foreign jurisdiction or in another province.

## D. POSSIBLE AREAS FOR CONCERN

The procedures for issuing Certificates of Qualification are identical for all those who have obtained their training in a jurisdiction other than Ontario. However, the potential exists for immigrants to face more difficult entry than those trained in other provinces.

This section looks at potential areas for concern. As before, numbers cross-reference to Exhibit VI-1.

### 1. Apprenticeship requirements

#### a) Assessment of credit towards apprenticeship training

The apprenticeship program may present barriers to immigrants. The Ministry of Skills Development assesses the qualifications of Immigrants (2). However, those who have not worked in the trade for a period in excess of the apprenticeship period in Ontario are usually referred to the apprenticeship program (4). Here the employer or the the Local Advisory Committee (LAC) (formed of employers) or Joint Advisory Committee (JAC) (if labour is also involved) determines the credit that the immigrant will receive towards the apprenticeship requirement in Ontario. Committees are set up on a regional basis by trade. Where they have been established the Committees are responsible for apprenticeship training. The assessment of credit for work overseas is subjective, based on a review of prior work experience, and often on a personal interview of the candidate.

Most often the immigrant is not credited with the full hours of training that are determined by the Ministry. A general rule of thumb suggests that the immigrant will not receive more than one-half of the hours needed for apprenticeship, regardless of the total hours of equivalent training received. Evidently a similar approach exists for apprentices who receive their training in another province. Rarely are they credited for their full hours towards their apprenticeship from the other jurisdiction.

#### (b) Requirements above the level specified in the regulations

Many LACs or JACs set minimum standards for apprenticeship above those set by the Ministry of Skills Development. Committees are empowered to set minimum standards in their region and tend to set them above those mandated by the Ministry. An example is the minimum educational

requirement. In some areas for some trades Ontario grade 12 or its equivalent is set as a minimum entry requirement even though the Ministry sets grade 10 or its equivalent as the entry requirement. Educational attainment may pose a disproportionate barrier to immigrants, who, because of social norms or other reasons, are less likely to have high educational attainment.

### 2. Provisional certificate

#### (a) Potential wage penalty for worker holding a Provisional Certificate

The Provisional Certificate provides temporary access to the trade in Ontario for those who have received their training elsewhere. It allows the immigrant to obtain employment in the trade until such time as he/she is able to successfully complete the exam for a Certificate of Qualification. With a PC the immigrant is allowed to do the same work as a journeyman.

The PC may provide the opportunity for an employer to exploit the immigrant tradesman. The immigrant may accept a first job at a low wage relative to the journeyman. The immigrant may be "locked in" to this low-wage job until he/she is able to obtain a Certificate of Qualification. Three factors tend to exacerbate the problem:

- Immigrants may find it difficult to pass the C of Q exam. Numbers are not available but it is felt by one observer that only about 30% of immigrants that write the exam pass compared to 80% of apprentices.
- The ease at which a PC can be renewed may encourage the immigrant to remain without a C of Q for extended periods.
- If the PC is allowed to lapse without renewal the immigrant may become permanently locked in the low-wage job. The employer is able to obtain a cheap source of labour. The immigrant is not able to advance. Because there are only 6 inspectors for all trades in Ontario it is

unlikely that the situation will be detected. In our interviews two electricians with 47 years of experience between them had never been asked for their certificate and could never remember having seen an inspector.

### b) Special requirement of the Ministry of Transport and Communications

The Ministry of Transport and Communications requires Motor Vehicle Mechanics to possess a Certificate of Qualification if they conduct safety checks. Thus, an immigrant who holds a PC is not authorized to conduct such work. This may prevent immigrants with a PC from obtaining employment in shops where safety inspections make up a high volume of business or in shops with few Motor Vehicle Mechanics.

### c) Are immigrants fully aware of procedures to get C of Q

The requirements for an immigrant obtaining access to a trade in Ontario appear straightforward. However, our community interviews report perceptions that the process is not an easy one. Our discussions within the trades suggest that many individuals appear not to be familiar with the requirements when they seek access.

## 3. The Certificate of Qualification

### (a) Language requirement of the exam

The certificate of qualification exam may be a significant hurdle for immigrants because of its language requirement, although extra time may be given to someone with a language problem or an interpretor may be used, the language requirement continues to be a significant problem for immigrants. Because the interpretor cannot be familiar with the trade he/she may not be able to translate slang or jargons used in the trade. Because the interpreter is not able to interpret for the same exam more than once during a year a shortage of qualified interpretors may occur.

### (b) Ministry of Skills Development data do not allow tracking

We obtained detailed data on the process of obtaining the C of Q from files at the Ministry of Skills Development. The files on C of Q applicants do not bear any identifier other than Social Insurance Number (SIN). Therefore, the only group of immigrants we could readily select were the non-landed immigrants, as they are all assigned SIN's beginning with 9. We found records on 141 applicants in this category, with attributes as shown in Appendix F.

Analysis of data on age, gender, trade and country of origin for this group show that all candidates had about the same pass rate on the C of Q exam. No significant barriers are revealed by these data. However, we must remember that the data represent only non-landed immigrants, many of whom would already have jobs when they arrive in Canada. We do not consider them representative of all immigrants.

Given this situation, we recommend further study, including capturing data on the permanent resident population applying for the C of Q, as well as on domestically trained applicants. Such a study would provide a comparison of the difficulties encountered in acquiring the C of Q.

# VII

# CONCLUSIONS AND RECOMMENDATIONS

This chapter summarizes our findings and presents recommendations for further investigations. To put the chapter in perspective, we begin with a brief discussion of the sources of information we used. In attempting to identify potential problems associated with access to professions and trades in Ontario, we found that evidence from the following sources tended to conflict or at least be inconsistent.

- The opinions of immigrants.
- Our understanding of the formal entry processes.
- The detailed data collected from the professional organizations

We attribute the differences to the following factors:

- Our assessment of the entry processes is based on a systematic analysis of the formal requirements for entry, as stated in the Acts and Regulations, augmented where possible by the knowledge of specific policies adopted in applying the formal requirements.
- We have noted potential for bias in the processes, usually where they depend on subjective evaluations of foreign academic qualifications.
- Immigrants' views may not be based on full awareness and understanding either of the rationale behind the entry requirements or of the internal administrative workings of the entry process.
- The data we captured from professional organizations were subject to possible errors and omissions because the administrative processes that produced them were neither intended nor designed to support this kind of research.

Regardless of the true conditions underlying all the above points of view, we suggest that the process of entry to professions should be guided by the principle that "justice should be seen to be done," with respect both to the human rights of people trained abroad and to the health, safety, and consumer interests of citizens.

Our recommendations tend to address general areas of concern. We found several instances of possible barriers to entry in specific professions and trades. But in most cases, we could reach no firm conclusions regarding their existence. The potential entry barriers tended to apply to many professions and trades. Therefore, the general theme of our recommendations for further study is to overcome the uncertainty surrounding many of our observations. In some cases, this means seeking more reliable and informative data. In others it means striving for more objective procedures, to evaluate foreign academic credentials, for example.

## A. SUMMARY OF FINDINGS

At this point we should note the tentative nature of our findings. Our sources of information are often not adequate to support firm statements. In this exploratory phase, we are seeking to point the direction for more definitive work that will lead ultimately to definition of responses to the issues indicated by this study.

### 1. Systemic Barriers are administrative, economic, and cultural in origin

'Systemic barriers' are requirements that may also be present for candidates trained in Ontario. But the requirements may have a disproportionate impact on immigrants. The systemic barriers we identified during the study arose from a variety of causes.

Most systemic barriers occur because administrative procedures have evolved around the entry process in order to facilitate its operation. The principal examples of administrative causes of systemic barriers are:

- Granting of equivalencies: all readily granted equivalencies are from white-dominated or English-speaking countries. Immigrants from other countries have difficulty getting equivalencies.

- Use of foreign accreditation bodies to assess academic qualifications: they tend to be based in the United States or in Great Britain and lack the global coverage needed to apply to immigrants trained in many other foreign countries.

- Use of professional associations to evaluate academic qualifications and employment experience: they may tend to favour the interests of current members more than those of immigrants trying to enter their field.

- Evaluation of academic qualifications and employment experience by committees of Ontario peers: they may lack the detailed and objective knowledge of foreign institutions and work environments to provide an accurate assessment.

- Limit on the number of times an individual may try an examination: language is often a major hurdle for immigrants trying to comprehend technical examination questions and to express their answers intelligently in a professional certification exam.

- Requirement to complete some period of practical experience, sometimes under supervision of a registered member, in Ontario: this takes time and may be difficult for immigrants to arrange.

- Use of the American Test of English as a Foreign Language (TOEFL) to measure linguistic proficiency: it may not be appropriate for measuring an individual's capability with the language as needed for the practice of a profession.

- Reliance on Ontario academic programs as a source of training for immigrant candidates who fail to meet the prescribed academic requirements: such programs are usually dominated by young students receiving first-time training, which requires quite a different orientation of teaching compared to that required by immigrants; also, some academic programs may be quite difficult to enter.

Many of the barriers have an economic component, demonstrated by the following examples:

- Places in academic training or supervised experience may be scarce because the Ontario economy already suffers from over-supply in the profession, medicine and dentistry being the prime examples.

- Peer review of credentials could potentially produce a conflict of interest if the reviewers feel that their practices or careers are threatened by new entrants to the profession coming from abroad.

- The cost of academic training and of entrance examinations, cited by some immigrants as a barrier, will depend on the resources required to conduct them, dentistry again being the prime example as far as exams are concerned.

Cultural and racial factors play a strong role in the perception of barriers, if not in the creation of actual barriers. One may argue that a perceived barrier is real if the professional organization involved does nothing to alter the perception. Examples of culturally derived barriers include:

- Difficulty in dealing with the social environments of the certification process, academic programs or employment (if needed to qualify in Ontario). Immigrants, especially those who do not come from White-dominated English-speaking, British Commonwealth countries, may have a greater burden than Ontarians in responding appropriately to these situations because they are familiar with the practices involved.

- The assumption that Canadian-trained professionals and trades-people are superior to foreign-trained, as demonstrated, for example, by the use of the term "upgrading". The intent of the training is usually to adjust the immigrant candidate's way of approaching certain aspects of practice to a manner better suited to Canadian conditions (different climate, materials, tools, consumer expectations, etc.), not necessarily to "improve" it. A better descriptor, perhaps "retraining", could be used.

## 2. Entry requirements rest largely with certifying bodies

The protection and safety of consumers provides the main rationale behind regulation of professions and trades. The certifying bodies recommend regulations and establish policies to specify and control entry to the trade or profession. Of particular concern to this study, section 10 of the Ontario Human Rights Code, Part 1, requires a profession, if challenged, to demonstrate that the requirement is reasonable and that to grant an exemption to a minority group, would cause undue hardship. In the case of a profession, undue hardship might be interpreted as excessive cost to the professional organization or a health and safety risk to the public. Thus the responsibility rests with the certifying body unless a challenge is raised whether a particular requirement is reasonable and bona fide and/or whether an exemption to the requirement should be granted.

On the other hand, it may be possible for a trade or profession to demand a level of proficiency above what consumers really need. Such a requirement might stem from a desire to restrict practice in a profession or trade that is already in a state of over-supply. Or the requirements might mirror academic standards that exceed the basic requirements of practice in the trade or profession. If such entry requirements could be shown to exist, they would constitute an entry barrier to all potential new entrants, of which foreign-trained candidates form a subgroup. This study neither was designed to look at nor had access to the kind of information required to determine whether entry standards in a profession or trade are set at a restrictive level.

We have pointed out the existence of several aspects of the entry processes that due to their subjective nature, could have a negative impact on a minority group. Our recommendations later in this chapter offer two possible responses to these issues:

- Further data collection and study to accurately assess the extent of the issue and therefore the appropriate form and strength of response from government.

- Examination of the feasibility of alternative methods that could eliminate the potential.

Only a few of the complaints we looked at can be clearly identified as hinging on issues related to training or qualifications earned overseas. Most complaints resulted from inconsistent application of criteria stipulated in Acts and Regulations. Whether the inconsistency related particularly to immigrants is impossible to tell from the official records of the proceedings.

### 3. Requirements have a disproportionately negative impact on members of minority and ethnic groups

We were asked to investigate whether entry barriers have a disproportionately negative impact on members of minority and ethnic groups. From our interviews with immigrant groups, our analysis of entry requirements and our limited data analysis, we tentatively conclude that immigrants of both genders, all races and most ethnicities encounter some barriers to certification. Depending on the immigrant's perception these may be seen as arising from overt discrimination rather than as coming from the interaction of the certification process with immigrants' credentials.

Certification requirements are designed primarily for English-speaking people, educated in the Ontario or Canadian system. Any person not meeting basic requirements will encounter barriers of language, academic equivalencies and re-training/examination. To the extent that an immigrant of a particular sex, race or ethnicity does not "fit" certification requirements, he or she will experience an entry barrier. All these people, however, will encounter greater barriers than English-speaking people trained in Ontario because their backgrounds do not perfectly match certification requirements.

Because some immigrants "fit" requirements less well than others, they may need more assistance in meeting certification standards. Gender, race and ethnicity probably affect the difficulty an immigrant has in getting the

support needed to fulfill certification requirements. For example, a single mother may not be given the financial and child-care support she needs while taking English as a Second Language classes, re-training, or studying for exams. A woman who is a "sponsored" immigrant will not be eligible for any government support while preparing for certification. This is a particular problem because so many women are sponsored by their husbands, who immigrated beforehand. Problems with support systems (ESL, re-training, etc.) compound the difficulties immigrants have in meeting certification requirements.

Summary data on gender for accountants, psychologists and physiotherapists show no significant differences for these professions. Data on applicants and inquirers in pharmacy, nursing and engineering tend to show differences largely related to country of training.. In pharmacy, the data suggest that women take longer to become registered. In nursing, applicants who are required to write TOEFL take significantly longer to become registered.

Having summarized our general findings, we now discuss the actions suggested for Phase II of this study.

## B. RIGOROUS ASSESSMENT OF NATURE AND EXTENT OF BARRIERS

### 1. Our findings may underestimate the extent of the problem

Our analysis of applicants' views of what constitute barriers to entry to professions and trades has been quite limited. We spoke with a sample of organizations representing immigrants, but the sample was not drawn in any rigorous fashion. In fact, we spoke mainly with people who had some entry problem to discuss. We have likely missed hearing about the views of immigrants for whom no barriers exist. This could explain some of the inconsistencies between the messages we got from the immigrant groups and from the data provided by professional organizations, and by the Ministry of Skills Development in the case of trades.

Furthermore, our comparative analysis of rates of progress through the entry processes in most cases relied on data only for people who had formally applied. This approach overlooks discrimination or barriers that might discourage an immigrant from even applying. As an example, we learned that many foreign dentists seek work as denture therapists because they feel that they stand no chance of entering dental practice in Ontario. Such cases would not appear in the data files for the Royal College of Dental Surgeons of Ontario and probably not even in the files of the National Dental Examining Board.

More accurate data on the extent of the problem will inform decisions on the nature and strength of government's responses. For example, if many immigrants are affected, government may decide to place emphasis on outreach and cultural exchange initiatives. If immigrants report that the issue is restricted to a small number of professions, government might prefer to put less emphasis on cultural exchange and to initiate discussions with those professions.

**2. Survey sample of immigrants to assess the extent of the problem**

The true extent of the problem can be understood best by comparing an immigrant's qualifications and work experience gained overseas with equivalent professional or trade recognition and work experience in Canada. This kind of study would provide a more thorough and rigorous analysis of barriers to entry to professions and trades, from the point of view of the immigrants. It would, perhaps most importantly, provide an estimate of the magnitude of the problem, measured by the number of people or the proportion of all immigrants who are or perceive themselves to be unfairly treated by the entry process.

If the immigrant's work experience involves a regulated trade or self-regulating profession, one could ask a series of questions including:

- Perception of entry requirements.

- Any steps to qualify in Ontario.
- Reactions to the entry requirements (identifying any requirements that have disproportionately negative impact).
- Plans for future efforts to become qualified in Ontario.

We suggest that further work should be undertaken to assess the feasibility and cost of such a study. There are at least three possibilities.

**(a) Follow immigrants using records of immigrant service organizations**

A number of the organizations contacted by this study maintain records of immigrants they have served in the recent past. These files could identify a group of immigrants that would be candidates to respond to a survey.

This general approach has at least two significant problems:

- Some immigrants may have no contact with service organizations. Such a list may under represent those immigrants who perceive little difficulty in securing employment, perhaps gaining trade or professional recognition, and in general becoming a productive member of the community. Therefore any survey based on a sample of clients of service organizations may overstate the extent of the problem.
- Gaining professional or trade certification may take a number of months or years. If the study seeks to examine the proportion of individuals qualified overseas who gain recognition in their trade or profession in Ontario, the study would have to be carried over a longer period of time. In most cases we expect that service organizations would not maintain active files for a sufficient period of time. Therefore the study would face a significant challenge in tracing immigrants who may well have moved one or more times in the intervening period.

Thus, this approach is best used if the study is to concentrate on the first few months of exposure to trades and professions in Canada. The more relevant question -- ultimate qualification status of immigrants -- will be difficult to analyze using this method unless a long-term tracking study is undertaken.

### (b) Identify immigrants through their sponsors

We are aware of a study design developed by Employment and Immigration Canada that called for contacting sponsors in order to locate immigrants three or four years after arrival in Canada. We are much more likely to be able to contact sponsors than immigrants since sponsors will be less likely than immigrants to have moved. Of course this method requires the cooperation of the federal department in providing access to immigration files. While such arrangements are not without precedent, it is not assured that the federal government would agree to support such a study. If federal cooperation can be gained, the study would interview a random sample of immigrants to assess their employment histories and certification problems.

This design will give a reliable estimate of the true nature and extent of barriers encountered by immigrants.

### (c) Screen the general population for immigrants

A third approach calls for contacting a random sample of households in Ontario and asking whether any member of the household is an immigrant (properly defined) who is or has been working (properly defined). If the initial questions identify a candidate respondent, we would proceed with the interview gathering the data required for this study.

This design will be relatively expensive because it requires contacting a large number of households in order to satisfy the screening questions and achieve a sufficient number of responses to support the analysis.

Estimates of the cost of the survey will depend largely on the precise definition of eligible respondents and the proportion those eligible respondents represent in the total population.

### 3. Terms of reference for Phase II: Rigorous assessment of nature and extent of barriers

We recommend that a study be undertaken to assess the feasibility of each of these three design alternatives and, on approval, to complete the survey. The essential steps are:

- Identify the policy questions of interest to the Cabinet Committee.
- Outline the analysis which will be required to respond to the policy questions, considering:
  - Requirement to represent minority or ethnic groups (perhaps establishing quotas of respondents to allow an analysis of smaller groups).
  - Requirement to represent gender (again potentially establishing quotas for females, perhaps by minority group and/or trade or profession).
- Define the target population of respondents, considering the length of time in Canada, proportion of immigrants likely to seek trade or professional certification and nature of the analysis required.
- Outline survey specifications, analysis requirements and expectations of the project report.
- Provide recommendations and estimates of cost.
- On confirmation of design and cost estimates, conduct the survey, analyse results, and prepare the report.

We anticipate that the discussions with the federal officials will be undertaken by provincial officials. The consultant should assist those discussions as necessary to ensure that all parties understand the requirements of the study and its potential benefits.

4. **Phase II and ongoing process: Professional organizations should keep more complete records**

We recommend that the Government of Ontario should require professional organizations to keep more complete records on those who inquire about and enter the admissions process. Professional organizations should submit annual reports on:

- Number of inquiries.
- Proportion of inquirers who submit applications.
- Proportion of applicants who satisfy entry requirements and are certified.

Data such as these should be analyzed by gender, country in which original qualification was achieved and language proficiency in English or French. Annual reviews of these results would indicate any emerging problems with entry requirements.

5. **Phase II and ongoing process: The Ministry of Skills Development should trace immigrants who hold Provisional Certificates**

As outlined in our discussion of the regulated trades, an immigrant may be granted a Provisional Certificate (PC) on the understanding that the candidate will either write the Certificate of Qualification exam (C of Q) or renew the PC. However the Ministry does not maintain contact with the immigrant. This raises the possibility that immigrants holding Provisional Certificates may be employed in their trade at wages below the wage of a fully qualified journeymen. At present the Ministry has no mechanism to follow up on those individuals who are granted the PC to ensure that they are proceeding toward the Certificate of Qualification.

In the longer term we suggest the Ministry of Skills Development should include these considerations in its current program to improve its computer-based records. However in the shorter term, as a Phase II study, the Ministry of Skills Development should establish a tracking system (probably a manual system) to maintain contact with individuals granted the Provisional Certificate. An analysis of the status of holders of the Provisional Certificate after one year in the labour force, would provide useful insights into the issues with respect to the regulated trades.

## C. REVIEW OF ACADEMIC EQUIVALENCY

### 1. Professional organizations use a variety of methods, most involving subjective judgement of individual cases

The immigrant community expressed a number of reservations about the methods used to assess academic equivalency. Some report substantial down-grading of credentials. Others suggested a cultural or racial bias in the recognition of overseas training.

The certifying bodies follow a variety of methods to assess academic credentials. Some use an examination which should represent an impartial objective assessment of the subject matter required for professional recognition. Others use informal guidelines, or a case-by-case review including personal interviews to determine equivalency (or exemptions granted). Some refer to external services, the University of Toronto for academic degrees and the Ministry of Education for secondary school education and teaching certificates. A few professional organizations recognize no training outside of Ontario.

Our work suggests that many of the barriers to entry into professions and trades stem from the procedures and methods used to evaluate a candidate's academic and experiential qualifications. In many trades or professions, this

step in the entry process requires subjective decisions based upon incomplete information about the precise curricula, etc., used in foreign countries. This subjectivity could be tainted by a variety of factors including: outdated impressions of training from a certain country or institution; a conflict of interest, mentioned earlier, that stems from an over-supply in the field: preconceptions based on race, gender or ethnicity; personal reactions to a candidate's attitude or appearance; poor information about some academic backgrounds, especially those in Soviet bloc countries, which may leave the cautious evaluating committee with no choice but to specify extensive testing and possibly retraining.

### 2. Test feasibility of more objective methods

We suggest that entry processes would be improved by adopting a method of assessing academic qualifications that is objective and blind to gender race and ethnicity. Both immigrant groups and professional organizations identified two possible responses:

- A central repository of information on degrees and equivalencies.
- An evaluating examination.

#### (a) Central repository

Representatives of some professional organizations made reference to the work carried out in the United States and the work in Quebec to establish repositories of information on degrees. Reports suggest that the U.S. initiative has been extensive with major investments to assemble a comprehensive list of universities and programs and to gather reliable and credible information about comparability. Quebec is undertaking a much more limited examination, seeking to develop a computer-based system that satisfies the same general requirements. This prior work may provide a ready basis for a central repository of equivalencies for use in Ontario.

Commentators on a central repository identified some challenges to the approach:

- A university or a single program within the university may change over time. In a few instances a political edict has changed programs overnight. Other programs have drifted over time to the point that a degree granted fifteen years ago bears only a modest relationship to a degree granted five years ago.

- If a repository seeks to reduce the subjective element in assessment of academic qualifications, it should be comprehensive and reasonable accurate over time (capturing changes such as those suggested above).

- Because of the emphasis on comprehensive and up to date information, a central repository will be expensive to establish and costly to maintain.

In any case, we cannot expect that a central source will provide universally reliable and comprehensive information. But it should allow a more consistent and defensible assessment of academic credentials. Some might argue that the process now followed by the professional organization is more thorough than even the most exhaustive repository of credentials. But reliance on a standard source should reduce the subjective judgement inherent in documentation review and interview processes.

### (b) Evaluating examination

The establishment of evaluative exams for the professions would satisfy the desire for an objective process that is gender, race and ethnicity neutral. In the trades, this problem is not quite as severe, since the Demonstration of Skills Test and the Certificate of Qualification exam essentially function in this capacity now. But, in a profession, the existence of an evaluative exam like that used by the Pharmacy Examining Board of Canada, would remove most of the subjectivity from assessments of academic equivalency. However, the design of such an examination must avoid cultural or linguistic biases.

Clearly the development and use of such exams for all professions would imply considerable effort and require very highly qualified professional assistance. The exams should be as accessible to candidates as possible. Therefore, they should be inexpensive to administer and to grade. As an example, the PEBC exam consists of about 300 multiple-choice questions. Such exams can be graded by computer. The exams could be available to potential immigrants before they leave their present countries of residence. If the exam could meet these conditions, there would be little need to deny anyone access to it. Ideally, the results of the exam should also provide clear direction as to what further training is required to meet the entry requirements of the profession, i.e. pass the entrance exam. Candidates should also receive complete descriptions of the syllabus and examinations required.

Use of an evaluating exam would probably reduce the administrative burden on many professional organizations. It would also eliminate the expense and delay that immigrants now face in trying to put together academic credentials.

We stress the distinction between this proposed exam and the entrance exam now used by most professional organizations. The entrance exam, in most cases, deals with how a professional should put the techniques and knowledge acquired during the academic phase of his or her career into practice. The evaluating exam we propose as an alternative to the many existing methods of assessing a candidate's academic qualifications and working experience would serve the same purpose as these methods. It would allow professional organizations to discern the readiness of a candidate to take the entrance exam.

A major hurdle in the development and use of this approach arises because it is not well suited to evaluating the manual skills that often determine a professional's readiness for practice. The evaluation of such skills is particularly important for physicians and surgeons, dentists, chiropractic, and similar health disciplines. But our main intent in proposing this kind of exam is to overcome the potential for inconsistency or subjective judgement in the

evaluation of less familiar foreign academic training. We do not expect it to replace internship or other forms of supervised experience.

Our findings suggest that evaluating exams should offer two significant advantages:

- The ethnicity and gender of the candidate is not apparent to anyone involved in the examination process.
- The examination can be scrutinized for its relevance to professional practice in Ontario as well its relationship to the standards applied to candidates trained in Ontario.

### (c) Commentary on screening procedures as applied to professional certification

The process of applying standards to applicants for professional certification is conceptually very similar to that of selecting staff to fill positions in an organization. Individuals who believe themselves to be qualified (i.e., possessing the requisite knowledge, skills and abilities to do the work) apply to practise their trade or profession. Presumably, applicants expect the screening/selection procedure to provide them with an equal opportunity for acceptance, based on their abilities. Unfortunately both technical and practical problems hinder the application of this principle.

Industrial and organizational (I/O) psychologists have been active in studying personnel selection practices. They have dealt extensively with problems in developing selection procedures that demonstrably adhere to the concept of fairness in hiring. Researchers are still wrestling with the problem of how best to establish criteria, and to prove their validity and fairness. Several general themes, however, are achieving the status of standards for the development of personnel selection procedures:

- The use of formal job analysis procedures to establish job content objectively and quantitatively, as well as to

identify the specific knowledge, skills and abilities required for satisfactory job performance. The findings of such job analyses may diverge dramatically from conceptions of job content based on the content of training or on descriptions prepared in the past which may not reflect current reality.

- The development of formal screening criteria based on job analysis findings. Such criteria should be objectively measurable, and should have the appearance of being related to the job. When assessment of these criteria involves the use of measuring instruments (particularly paper and pencil tests), these instruments should be of acceptable reliability. The exact meaning of 'acceptable' here is a matter of professional judgement.

- The need to validate the criteria used. This is the most difficult area for several reasons. First, practitioners will not always agree on what constitutes good practice in their field. Specific criteria may be subject to dispute. Second, many jobs have few criteria which are reliable enough to provide accurate performance information. Third, practical constraints will limit the availability of validity data. The major problem here is that job performance data will not be available for rejected applicants. As a result, it is typically not possible to demonstrate that the job performance of unsuccessful applicants is poorer than that of successful applicants. The only alternative is to see whether higher scoring successful applicants perform better on the job than lower scoring (but still successful) applicants. Statistical procedures exist to estimate the validity of the screen corrected for this restriction of range caused by selection.

Use of screening criteria which cannot be shown to be reliable, valid, and job-related may expose those applying the criteria to the risk of challenge under section 10 of the Ontario Human Rights Code. Certainly there exists in the U.S. a substantial record of judicial decisions in this area. Canadians being generally less litigious than their neighbours, it is not yet clear to what extent American experience with suits of this type will be repeated here. Still, employers and professional bodies in this country should expect to be affected by this trend.

How can the Government of Ontario encourage its professional organizations to adopt to improved changes in regard to admission standards? An obvious possibility is the development of guidelines, for use by individual bodies, which would:

- Advocate the use of job analysis techniques to establish the knowledge, skills and abilities needed for satisfactory performance.
- Establish criteria for selection procedures in terms of their reliability and validity.
- Express the need to monitor continually the evolution of the trade or profession so that standards can be adjusted accordingly.

### 3. Terms of reference for Phase II study: Improved methods of assessing academic equivalency

We recommend the following terms of reference for a research project.

- Review literature. Examine U.S. experience with the several sets of guidelines which have been in existence there since the late 70's.
- Identify and document exemplary approaches. Certain professional organizations in either Canada or the U.S. may be conducting their admission screening in a truly exemplary fashion. It would be useful to identify and document the practices of several such organizations to use as models.
- Develop draft guidelines for use in Ontario. Based on experience elsewhere, as well as on the work done for this report, we would draft a set of general guidelines for the establishment of standards of admission to professional organizations in Ontario.

The alternative approach, a central repository, may have merit. It should be examined in parallel under these terms of reference:

- Examine practice in other jurisdictions, particularly Quebec and the United States, considering the role of government, the approaches taken and the reactions of the professional organizations.
- Assess likely cost and timetable to implement a repository in Ontario.

The report should recommend an overall strategy to the Government of Ontario:

- Compare cost and timetable of implementing each approach, their merits and weaknesses.
- Recommend course of action for Ontario.

## D. CREDIT FOR WORK EXPERIENCE

### 1. Immigrants feel work experience is under-valued

Immigrants feel that their work experience, often including years of successful practice in a profession, receives little or no recognition in Ontario. Some have challenged the credit given for work experience as reflecting a cultural or racial bias.

The professions report that in some cases, exemptions are granted from academic requirements on the basis of work experience. However the practice of the profession varies widely -- from no recognition of overseas work experience through to granting exemption from much of the formal education/examination process.

## 2. Terms of reference for Phase II project: Assessment of work experience

A Phase II project should examine current practices on the extent to which work experience exempts a candidate from an examination of academic training and from pre-qualification internship or experience requirements. At present, professional organizations in Ontario follow different principles in this matter. The differences may well work to the disadvantage of immigrants who attempt to qualify in some professions.

The basic dichotomy in this investigation is between consideration of work experience overseas with respect to pre-qualification work requirements in Ontario and with respect to evaluating and/or qualifying examination in Ontario. Each step in the study should separate these two aspects of recognition of work experience.

Such a study should:

- Review any formal or informal guidelines and the results of current decisions with respect to recognition of overseas work experience in each of the professions.
- Review the rationale for guidelines and/or specific decisions with the professional organizations.
- Summarize the current practices and considerations in a report to Government that can be shared widely among the professions. The report should seek to develop recommendations to the Government and the professional organizations for a general strategy with respect to recognition of overseas experience.

The final report of this project should help each professional organization examine its own practices with respect to recognition of work experience overseas. The description of rationale developed as part of the project would provide a useful input to the efforts to improve communication about certification processes.

## E. LANGUAGE PROFICIENCY

### 1. The Test of English as a Foreign Language (TOEFL) is used widely

A number of professions use TOEFL to determine if a candidate satisfies language requirements. Immigrant groups voiced criticism of the test, suggesting that the criteria to pass the test bear little relationship to on-the-job language needs. They commented that preparatory courses are not readily available. Applicants tend to rely on tutors and less formal training supports.

Professions using the test have selected different minimum scores to indicate acceptable levels of language proficiency.

### 2. Terms for reference for a Phase II project: Appropriateness of TOEFL to language needs of practising professionals

The use of TOEFL should be examined in a Phase II project from two points of view:

- Does the TOEFL adequately test the language requirements of a practising professional? The details of the test should be examined carefully. It may place too much emphasis on correct grammar and style and insufficient emphasis on the technical vocabulary required of a practising professional. This work should be undertaken by an expert in test construction who can examine:
  - The language requirements in a cross section of professions in Ontario.
  - The extent to which the TOEFL reflects those language requirements.
- Are adequate training programs and support services available for immigrants who must achieve at least a target score on the test to meet qualification standards.

The study should recommend any changes to current practices that may be indicated by the study findings.

## F. PROMOTION OF INFORMATION EXCHANGE AND CULTURAL SENSITIZATION

The Government of Ontario should take an active role in promoting information exchange and cultural sensitization, both for immigrants and for licensing bodies. In practical terms, the government could use a number of strategies to promote a better understanding between immigrants and licensing bodies.

### 1. Phase II: Government should facilitate discussion of academic equivalencies

The government should facilitate and support the efforts of immigrant groups to educate licensing bodies about foreign credentials. For example, the Filipino Association for Academic Accreditation has already met with the three accounting bodies to present information on credentials from the Philippines. This has led to a greater acceptance of these credentials. Such efforts are, however, difficult for immigrant groups to undertake on a voluntary basis. The government could assist selected groups representing immigrants to meet with licensing bodies. Assistance could take the form of "door-openers" to licensing bodies and some financial aid to immigrant groups in preparing presentations.

### 2. Phase II: Government should facilitate improved communication between licensing bodies and immigrants

The Government of Ontario should encourage licensing bodies to provide immigrants with more information on certification requirements. We

found that many immigrant groups have limited understanding of either the process of certification or the rationale. At present, many immigrants seem to see the licensing bodies as obstructive and protectionist. The licensing bodies, on the whole, do not appear to be communicating effectively with immigrants.

Four certifying bodies provide published material other than copies of the regulations, to applicants. A pamphlet prepared by each certifying body that provides a concise, informative and official description of the process, its rationale and requirements of applicants would do much to bridge the information gap faced by immigrants.

To ensure that licensing bodies communicate well with immigrants, the government could offer licensing bodies a program of cultural sensitization. Such a program could provide information on the general difficulties many immigrants are facing (language barriers, access to housing and employment, poverty, insecurity, anxiety). It could also inform licensing bodies about cultural differences in behaviour and attitudes. Further, it could address the underlying assumption of cultural superiority which many immigrants feel is embodied in licensing requirements.

The government should also encourage licensing bodies to meet with immigrant groups to explain the rationale for certification requirements. If immigrants are informed about why certain standards exist and how the standards relate to practise, their attitudes towards certification requirements may change. They would also be in a better position to prepare themselves for certification.

At the individual level, immigrants may need extra support in understanding certification requirements. Licensing bodies should be encouraged to be patient and helpful when working with immigrant's applications. We are not suggesting that licensing bodies develop "special" requirements for immigrants. Rather, we are recommending that the government encourage licensing bodies to recognize immigrant's difficulties and respond to them to ensure that qualified immigrants meet certification requirements.

### 3. Phase II: Government should facilitate education of immigration officials/agency staff about certification requirements

The government should also try to ensure that immigration officials, both here and abroad, are well-informed about certification requirements. For many immigrants, immigration officers abroad and settlement workers in Ontario are their primary sources of information about certification. Our impression is that these officials are not always fully aware of the certification procedures and requirements for all professions and trades. Consequently, they are not always able to give immigrants the advice and guidance needed to obtain certification. If complete information were available through immigration workers, some certification difficulties could be reduced.

## G. DETAILED ANALYSIS OF TRADES

The immigrant community identified relatively few issues with respect to trades. However our review of the processes followed by the trades identified additional activities which should be undertaken.

### 1. Terms of reference for a Phase II study: Immigrants in apprenticeship

Phase II of the study should undertake a further examination of immigrants who enter apprenticeship training. The terms of reference should include these elements:

- Describe the number and trade, of immigrants beginning apprenticeship training each year. If the numbers are very small, less formal methods could be used to deal with any issues identified subsequently.
- Determine the credit given for experience offshore to these candidates.

- Describe the educational requirements imposed by employers and/or Local Advisory Committees.

- Given the data gathered above, recommend guidelines and procedures to the Ministry of Skills Development to respond to the situation. Recommendations might include:

  - A tracking system to monitor decisions taken by the decentralized system of Local and Joint Advisory Committees and employers with respect to immigrant apprentices.

  - Clarification of the interpretation of Section 10 of the Ontario Human Rights Code with respect to educational requirements of immigrant apprentices.

  - Annual reports to summarize the results achieved by immigrant apprentices.

## 2. Terms of reference for a Phase II study: Immigrants holding Provisional Certificates

The Ministry of Skills Development should implement a tracking program to ensure that immigrants granted a Provisional Certificate are making appropriate progress toward achieving a Certificate of Qualification. As part of this effort, the Ministry should ensure that holders of the Provisional Certificate are fully aware of the procedures to earn the Certificate of Qualification.

The program to monitor Provisional Certificate holders should track their success in the Certificate of Qualification exam. This study suggests that the language requirement of the exam is a significant problem for immigrants. Analysis of the success rate and the work history of candidates holding the Provisional Certificate should provide additional data that will assist the Ministry of Skills Development to examine and improve its processes.

## H. PRIORITIES FOR PHASE II

The issues raised by immigrants and the results of our analysis of formal entry requirements and data on individual inquirers and applicants indicate that first priority should be given to:

- Review of alternative methods of assessing academic equivalencies.
- Promotion of information exchange and cultural sensitization.
- Analysis of immigrants entering the trades.
- Assessment of the appropriateness of TOEFL.

To provide a better understanding of the extent of the problem, we recommend that first priority should also be given to:

- Rigorous assessment of the extent and consequences of barriers.

The remaining recommendations should be implemented as important but lower priority initiatives.

# APPENDIX A

# TERMS OF REFERENCE

# STUDY ON ACCESS TO PROFESSIONS AND TRADES

## TERMS OF REFERENCE

### Purpose

To identify requirements for entry into professions and trades which appear to create barriers for persons whose qualifications were received outside Canada, and to identify any such requirements which have a disproportionately negative impact on members of minority and ethnic groups.

### Background

The government has received complaints that many minority and ethnic individuals are unable to practise their profession or trade because their qualifications are not recognized in Ontario.

The Cabinet Committee on Race Relations considered the issue and recommended an exploratory study to identify the nature and extent of the problem, to be followed by a more in-depth study whether warranted.

### Method

1. Review and analyse records of complaints received by the Ontario Human Rights Commission and the Race Relations Division, the Ontario Women's Directorate, the Ministry of Citizenship and Culture and other branches of the government.

2. Conduct interviews with visible minority and ethnic individuals and representatives in the different regions of the province to ascertain certification problems experienced by member of their communities.

3. Collect available data on the professions and on a representative group of trades regarding certification requests, including data on the number who have applied for certification, the number refused and the number accepted over the past five years, the country where the applicants' training and work experience were received and gender.

4. Consult with representatives of the professions and trades whose requirements appear, from the information gathered under items 1 to 3, to create barriers for foreign-qualified persons.

5. Identify those requirements which appear to create barriers for foreign-qualified persons.

6. Prepare written or oral progress reports to the steering committee as required by the committee chairperson.

7. Prepare a final report by March 31, 1987 which:

   - Identifies the professional and trade entry requirements which appear to provide barriers to persons with foreign qualifications, the nature of the barriers and the apparent extent of the problem.

   - Discusses the impact of such requirements on visible and ethnic minorities.

   - Recommends which requirements merit an in-depth examination to consider their justification and the extent to which they can be modified to meet legitimate concerns.

   - Recommends terms of reference for the in-depth examination.

Time Frame

| | |
|---|---|
| Project Length: | January 2, 1987 - March 31, 1987. |
| Proposals: | To be submitted on or before December 7, 1986 to: Dick Clarke, Senior Policy Advisor, Policy Branch, Ministry of Labour, 15th Floor, 400 University Avenue, Toronto, Ontario M7A 1T7. |
| Final Report: | March 31, 1987. |

Government Contact

Dick Clarke, Chairperson of the interministerial steering committee for the project, 965-9764.

Final Report

To include conclusions, recommendations and executive summary.

# APPENDIX B

## INFORMATION PACKAGE SENT TO IMMIGRANT GROUPS

March 23, 1987

Dear :

As we discussed, Abt Associates is working on a study commissioned by the Ontario Cabinet Committee on Race Relations, through the Ministry of Labour. The study concerns the difficulties encountered by visible and ethnic minorities groups in qualifying for the practice of some professions and trades in Ontario. The particular focus is new Canadians who received their training outside of Canada.

As one component of the study, we would like to meet with you to explore this issue. Specifically, we need your help with the following questions:

- From your experience, which trades and professions have certification requirements that are particularly difficult for new Canadians to meet?
- What is the nature of certification problems immigrants have encountered (e.g. equivalencies not granted, lack of upgrading training, certification process too stringent, rules inconsistently applied, over-enforcement of regulations, etc.)
- Has there been any data collected on the numbers of people who have encountered barriers in having their training recognized? Or lacking data, do you have any thoughts on what the scope of the problem might be?

For your information, we are enclosing copies of the Attorney General's speech to the Legislature and a press release concerning the study.

We look forward to meeting with you.

Yours sincerely,

**ABT ASSOCIATES OF CANADA**

Chris Wihak
Associate Consultant

CW/ka

Enclosure

STATEMENT BY

THE HONOURABLE IAN SCOTT
ATTORNEY GENERAL

TO THE LEGISLATURE

RE: REVIEW OF CERTIFICATION REQUIREMENTS
FOR PROFESSIONS AND TRADES

CHECK AGAINST DELIVERY

As Chairman of the Cabinet Committee on Race Relations, I would like to report on some recent developments arising out of the Committee's work.

First, in response to concerns expressed by ethnic and minority communities for a number of years, I am pleased to announce the first phase of an intensive review of entry requirements of professions and trades. The purpose of this research is to determine to what extent existing certification requirements act as barriers to individuals whose qualifications were obtained abroad.

The first phase of the study will involve working closely with minority groups and the professions and trades to isolate appropriate targets for change among the myriad of professional and trade rules. The consulting firm of Abt Associates will conduct this phase of the review which is to be completed by March 20, 1987.

After targets for change have been identified, we intend to immediately undertake in consultation with affected professions and minority groups, the second part of the review process. The goal of Part 2 is to change those certification requirements which cannot be justified as necessary to maintain appropriate professional standards.

THE OVERALL PURPOSE OF THIS EXERCISE, FOR WHICH MINORITY GROUPS HAVE BEEN WAITING FOR SOME TIME, IS TO ENSURE THAT THE RULES OF ENTRY INTO PROFESSIONS AND TRADES PROVIDE THE PUBLIC WITH WELL-QUALIFIED PRACTITIONERS WITHOUT PRESENTING ANY UNFAIR DISADVANTAGE TO THOSE WHO HAVE RECEIVED THEIR TRAINING OR QUALIFICATIONS OUTSIDE CANADA.

THE STUDY IS BEING FUNDED BY TWELVE MINISTRIES AND THE ONTARIO WOMEN'S DIRECTORATE OUT OF EXISTING RESOURCES.

SECOND, IN KEEPING WITH THE ONTARIO WOMEN'S DIRECTORATE'S IDENTIFICATION OF VISIBLE MINORITY WOMEN AS A TARGET GROUP FOR GOVERNMMENT PROGRAMS AND SERVICES IN MAY, 1986, THE DIRECTORATE IS PLANNING A SERIES OF WORKSHOPS THROUGHOUT THE PROVINCE FOR VISIBLE MINORITY WOMEN, LOCAL GOVERNMENT PEOPLE AND GROUPS PROVIDING SERVICES TO VISIBLE MINORITY WOMEN. THE WORKSHOPS WILL BEGIN THIS SPRING AND ARE INTENDED TO FACILITATE MINORITY WOMEN'S GROUPS' ACCESS TO GOVERNMENT SERVICES AND TO ENSURE THAT THESE GROUPS HAVE A SIGNIFICANT IMPACT ON GOVERNMENT POLICIES AFFECTING THEM.

THE CABINET COMMITTEE ON RACE RELATIONS IS ACTIVELY WORKING ON ACHIEVING THE GOALS IN THE GOVERNMENT'S RACE RELATIONS POLICY STATEMENT. I AND SOME OF MY FELLOW MINISTERS LOOK FORWARD TO ANNOUNCING FURTHER DEVELOPMENTS IN THE NEAR FUTURE.

Ontario

# NEWS RELEASE
# COMMUNIQUÉ

Ministry of the Attorney General | Ministère du Procureur général

ATTORNEY GENERAL ANNOUNCES
REVIEW OF CERTIFICATION
REQUIREMENTS FOR PROFESSIONS
AND TRADES

January 27, 1987

TORONTO -- Attorney General Ian Scott today announced in the legislature the first phase of a government review of entry requirements for professions and trades. The review will help identify those requirements which may act as barriers for members of ethnic and minority groups who have obtained their qualifications abroad.

"This initiative responds to concerns expressed by ethnic and minority communities for a number of years," Mr. Scott said.

"The process is designed to ensure that certification requirements provide the public with well-qualified practitioners without presenting any unfair disadvantage to those who have received their training or qualifications outside Canada," Mr. Scott added.

The first stage of the government review will be conducted by the consulting firm of Abt Associates and is to be completed by March 20, 1987. The consultants will work closely with minority groups and the professions and trades to isolate appropriate targets for change among the myriad of professional and trade rules.

During the second phase of the project the government will explore the possibility of making changes to those rules which cannot be justified as necessary to the maintenance of appropriate professional standards. Affected professions and minority groups will be closely involved in this stage.

The certification study is being funded by twelve ministries and the Ontario Women's Directorate out of existing resources.

Also announced in Mr. Scott's statement was the presentation by the Ontario Women's Directorate of a series of workshops for visible minority women. The workshops, which will commence this spring, are designed to facilitate minority women's groups' access to government services on a local basis and ensure that these groups have a significant impact on government policies affecting them.

Mr. Scott said he and other ministers are looking forward to announcing in the near future further programs designed to achieve the goals contained in the government race relations policy statement of May 1986.

- 30 -

Ref: Policy
Doug Ewart
965-2816

# APPENDIX C

# BIBLIOGRAPHY ON EQUIVALENCIES

# SOURCES OF INFORMATION

# ABOUT THE EDUCATION SYSTEMS OF

# COUNTRIES OTHER THAN CANADA

# AND THE UNITED STATES

These materials are useful for non-specialists and specialists who need to identify what education and/or training a person has achieved in another country. They also give guidance in matters of evaluation, comparability, and equivalency .

E.L.H.
Nov. 1986

THE AMERICAN ASSOCIATION OF COLLEGIATE REGISTRARS AND ADMISSIONS OFFICERS ( AACRAO): One Dupont Circle, N.W., Suite 330, Washington, D.C. 20036.

NATIONAL ASSOCIATION FOR FOREIGN STUDENT AFFAIRS (NAFSA), 1860 Nineteenth Street, N.W. Washington, D.C. 20009

THE COUNTRY INDEX (1971), and THE COUNTRY INDEX: REVISED EDITION VOLUME I (1986). Distributed by Frank Severy Publishing, 208 North Champion Place, Alhambra, CA 91801 - 2810.

U.S. DEPARTMENT OF EDUCATION. 400 Maryland Ave., S.W., Washington, D.C. 20202. Publishes studies of education in a number of foreign countries.

AMIDEAST (American-Mideast Educational and Training Services), Suite 100, 1717 Massachusetts Avenue, N.W., Washington, D.C., 20036. See Education in the Middle East (1983) and Directory of Academic and Technical Training Programs in Selected Middle Eastern and North African Countries (1986).

ERIC (Educational Resources Information Center). ERIC comes under the U.S. Department of Education. It is a repository for education documents of all kinds - including foreign education.

COLLEGE ENTRANCE EXAMINATION BOARD ( CEEB). Known as The College Board. Publishes a few studies of foreign education systems. Inquire from College Board Publication, Box 866, New York, N.Y. 10101.

OECD. The Organization for Economic Co-operation and Development. Contact Director of Information, OECD, 2,rue Andre-Pascal,75775, Paris Cedex,16 France. One of its concerns is the national policies of education in its member countries.E.g. see the 1981 study of Yugoslavia.

THE WORLD BANK The Bank is involved with education in over 70 nations and publishes and/or sponsors studies about education systems. Contact World Bank Publications, P.O. Box 37525, Washington, D.C. 20013.

THE NATIONAL CASE STUDY: AN EMPIRICAL COMPARATIVE STUDY OF TWENTY-ONE EDUCATION SYSTEMS, A. Harry Passow et al for International Association for the Evaluation of Educational Achievement (IEA) Stockholm, 1976.. John Wiley & Sons, Toronto.

THE BRITISH COUNCIL:"A Guide to Overseas Qualifications" . Covers 100 or more countries. Describes education systems and gives equivaleneies to the British system (which could be a problem for Canadian users). Contact The British Council, 80 Elgin Street, Ottawa, Ont. K1P 5K7.

COMPARATIVE EDUCATION REVIEW. The official journal of the Comparative and International Education Society (CIES). Available from the University of Chicago Press, Journals Division, P.O. Box 37005, Chicago, Ill. 60637. Covers world education and publishes bibiographies of journal articles twice a year.

INTERNATIONAL JOURNAL OF INTERCULTURAL RELATIONS: The official publication of the International Society for Intercultural Education, Training and Research. The journal always has some material on education in one or more countries. The Society also publishes a quarterly newsletter Communique, and books and workshop materials. For information write to the SIETAR International Secretariat, Publications Division, 1414 22nd Street, N.W., Washington, D.C. 20037.

INSTITUTE OF INTERNATIONAL EDUCATION, 809 United Nations Plaza, New York, N.Y.. Provides a wide range of international education services such as books, periodicals, reports, conferences, seminars, workshops, etc.

INTERNATIONAL BACCALAURATE. The office of IB is at Palais Wilson, Geneva, Switzerland. See the 1986 edition of The Country Index for detailed information about this international program and exam system.

RESEARCH PROJECT: QUALITY OF EDUCATION IN AFRICA. The advertising material states that "the reports reflect current thinking of indigenous decision-makers". It might be interesting to check it out if it is available in public or university libraries. The Project series is titled "African Studies in Curriculum Development and Evaluation".

Besides the books and journals described elsewhere in this resource material, the following should also be mentioned. Of course, there are many other materials available and, increasingly, new sources of information.

COMMONWEALTH UNIVERSITIES YEARBOOK: London. Association of Commonwealth Universities. Published yearly. Gives a listing of universities with information on programs, entrance requirements, and British-patterned education. Distributed by International Publication Service, 114 East 32nd Street, New York, N.Y. 10016.

INTERNATIONAL BIBLIOGRAPHY OF COMPARATIVE EDUCATION: P.G. Altbach. G.P. Kelly and D.H. Kelly. Praeger, 11981. Gives a general introduction to comparative education and its literature and bibliographies group by world area or countries.

INTERNATIONAL HANDBOOK OF UNIVERSITIES: Provides a descriptive listing of institutions of higher education throughout the world, excluding the British Commonwealth and the United States. Gives information on programs and entrance requirements. Is updated regularly. Distributed by Walter de Gruyter, Inc., 200 Saw Mill River Road, Hawthorne, N.Y. 10532.

LATIN AMERICA: CULTURAL CAPSULES:Jorge W. Garcia, Pae Publications, Wyoming, Mich, 1984. A set of monographs on the following countries (some education information is included): Argentina, Bolivia, Brazil, Chile, Columbia, Costa Rica, Cuba, Dominican Republic, Ecuador, El Salvador, Guatemala, Honduras, Mexico, Nicaragua, Panama, Paraguay, Peru, Puerto Rico, Uruguay, Venezuela.

WORLD SURVEY OF EDUCATION: Paris, United Nations Educational, Scientific and Cultural Organization (UNESCO). In almost all cases each country prepares its own material, according to a pre-determined format. Volume I - Handbook of Educational Organization and Statistics; Volume II - Primary Education; Volume III - Secondary Education; Volume IV - Higher Education.

WORLD YEARBOOK OF EDUCATION: Kogan Page Ltd., publisher. Each Yearbook emphasizes a different education topic. For example, the 1979 edition featured recurrent education and lifelong learning.

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CANADIAN AND INTERNATIONAL EDUCATION, the official journal of the Comparative and International Education Society of Canada. The journal is published twice a year and emphasizes education in an international perspective. Address: Faculty of Education, The University of Calgary, Calgary, Alta. T2N 1N4.

cont'd.

INTERNATIONAL EDUCATION: published by the College of Education, The University of Tennessee, Knoxville, Tenn., 37996 - 3400. Published twice a year. It is addressed to professionally trained international educators and to people who work on evaluation/comparability of education documents of foreign students or residents of the U.S. and Canada.

INTERNATIONAL REVIEW OF EDUCATION: edited by the UNESCO Institute for Education, Feldbrunnenstrasse 58. 2000 Hamburg 13, Federal Republic of Germany. The Review was first published in 1955 as an international forum for the exchange of information about advances in educational theory and practice throughout the world. It is published quarterly. Contributions are published in English, French or German, and each article is preceded by abstracts in all three languages. Orders may be placed through Kluwer Boston Inc., 190 Old Derby Street, Hingham, MA. 02043, U.S.A.

WESTERN EUROPEAN EDUCATION: A quarterly journal of translations from leading West European education journals. Covers all areas of education. First issue was Spring 1969. Contact M.E. Sharpe, Inc. 80 Business Park Drive, Armonk, New York, 10504.

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THE GLOSSARY OF FOREIGN EDUCATIONAL TERMS: Compiled by Theodore E. Sharp, International Education Research Foundation, Inc. Published and Distributed by Severy Publishing Co., 208 N. Champion Pl., Alhambra, CA 91801.Covers 14 European countries plus Iceland and Turkey. Is a compilation of words, phrases, and terms found in foreign academic credentials with appropriate American-English translations.

FOREIGN EDUCATION CREDENTIALS REQUIRED FOR ADMISSION TO UNIVERSITIES AND COLLEGES IN THE U.S. Edited by G. James Haas. Third edition. Updates information for 126 countries and adds 54 more. Copies are available from Hattie Jarmon, Education Specialist, Academic Advisory Service, AID Office of International Training, Washington, D.C. 20523.

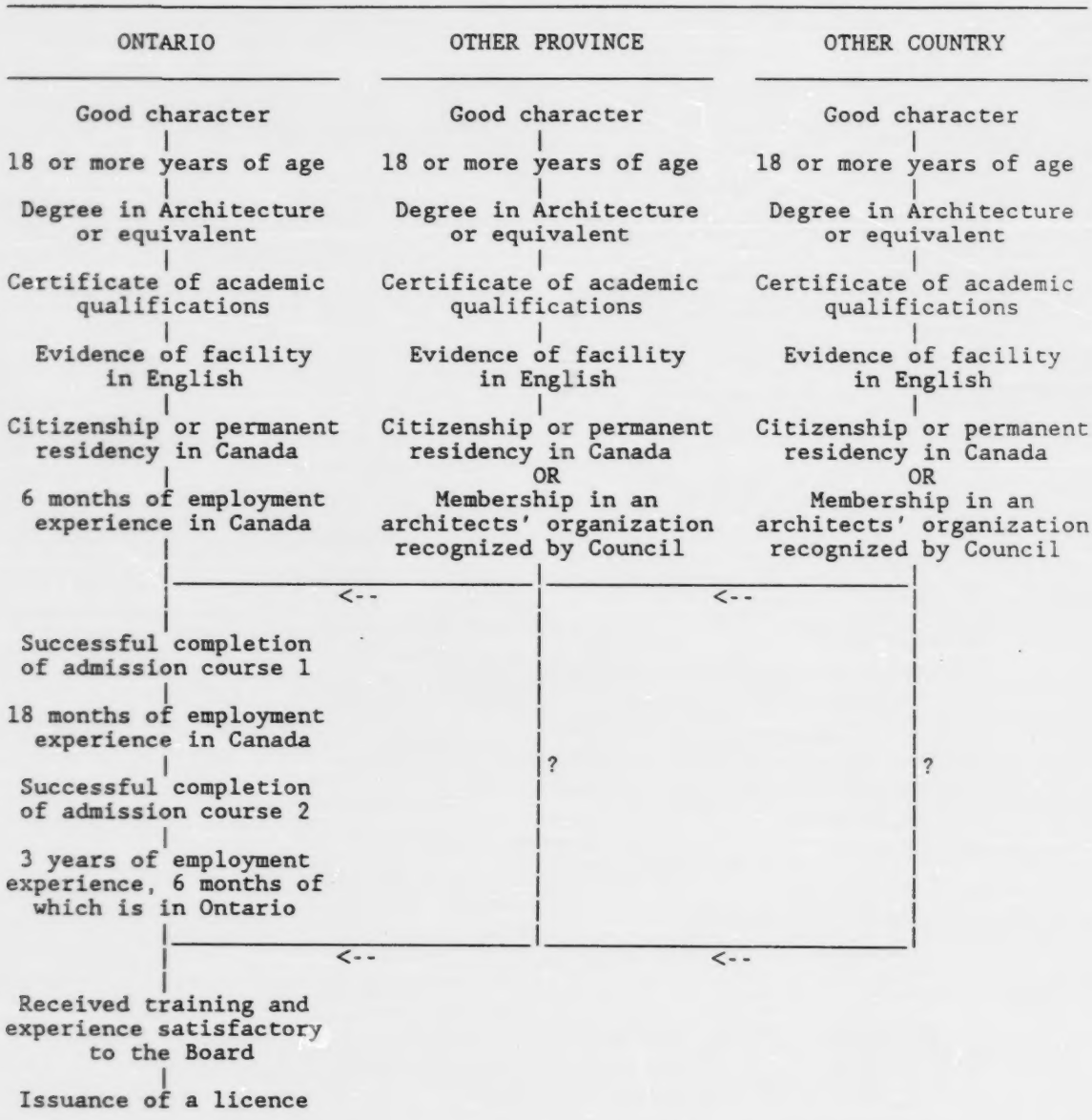
# APPENDIX D

## FLOWCHARTS OF THE ENTRY PROCESS OF THE PROFESSIONS

The flowcharts in this appendix describe, in simplified terms, the processes required to enter practice in each of the professions. In most cases, the responsible governing body has seen the flowchart and provided either a confirmatory or amending response. Exceptions are noted on the relevant charts.

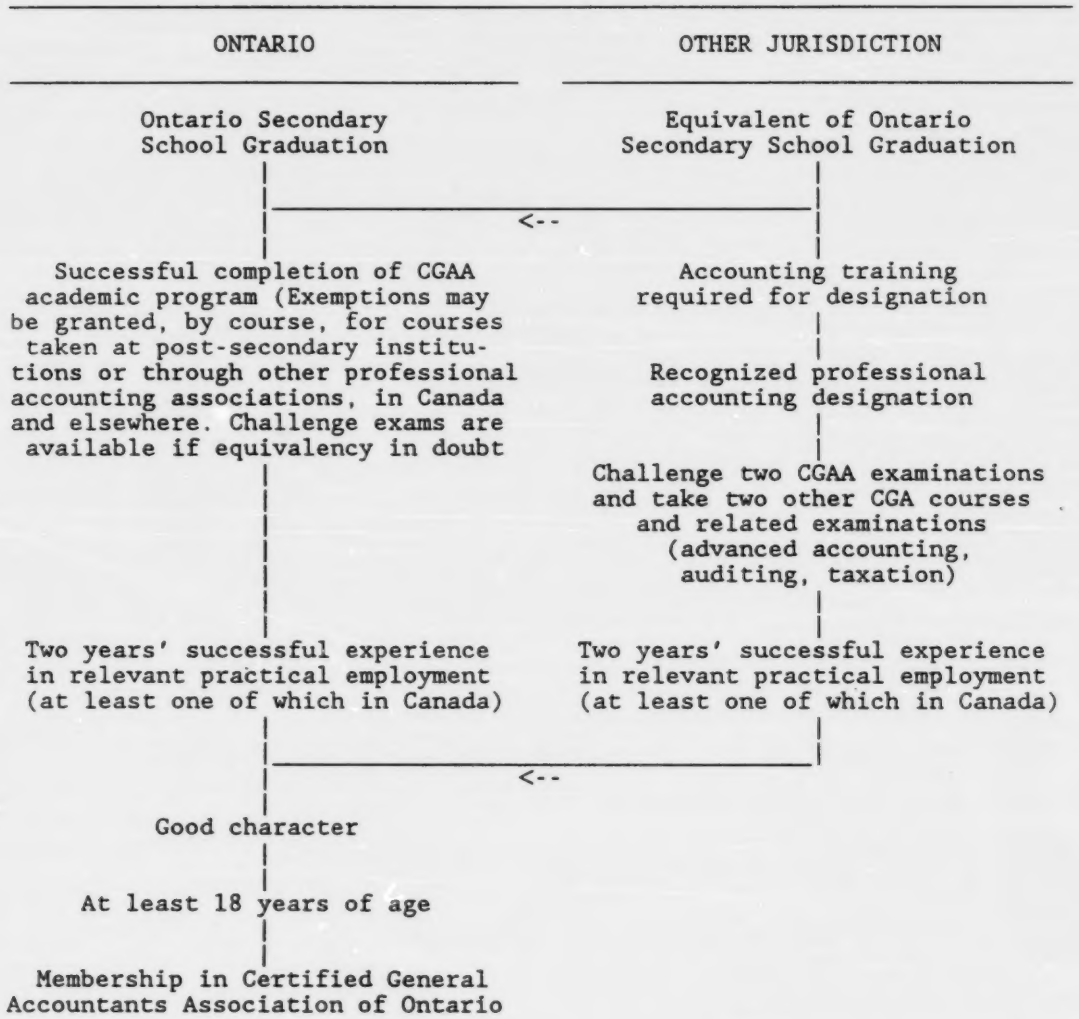

| Index to Charts | Page |
|---|---|
| Process of entry to practice as an Architect | D-1 |
| Process of entry to practice as a Certified General Accountant | D-2 |
| Process of entry to practice as a Chartered Accountant | D-3 |
| Process of entry to practice as a Chiropodist | D-4 |
| Process of entry to practice as a Chiropractor | D-5 |
| Process of entry to practice as a Dental Surgeon | D-6 |
| Process of entry to practice as a Dental Technician | D-7 |
| Process of entry to practice as a Denture Therapist | D-8 |
| Process of entry to practice as a Drugless Therapist | D-9 |
| Process of entry to practice as an Engineer | D-10 |
| Process of entry to practice as a Funeral Director | D-11 |
| Process of entry to practice as an Insurance Broker | D-12 |
| Process of entry to practice as a Land Surveyor | D-13 |
| Process of entry to practice as a Lawyer | D-14 |
| Process of entry to practice as a Masseur | D-15 |
| Process of entry to practice as a Nurse | D-16 |
| Process of entry to practice as a Nursing Assistant | D-17 |
| Process of entry to practice as an Ophthalmic Dispenser | D-18 |
| Process of entry to practice as an Optometrist | D-19 |
| Process of entry to practice as an Osteopath | D-20 |
| Process of entry to practice as a Pharmacist | D-21 |
| Process of entry to practice as a Physician or Surgeon | D-22 |
| Process of entry to practice as a Physiotherapist | D-23 |
| Process of entry to practice as a Psychologist | D-24 |
| Process of entry to practice as a Radiological Technician | D-25 |
| Process of entry to practice as a Veterinarian | D-26 |

## PROCESS OF ENTRY TO PRACTICE AS AN ARCHITECT IN ONTARIO


ONTARIO
OTHER PROVINCE
OTHER COUNTRY
Good character
18 or more years of age
Degree in Architecture or equivalent
Certificate of academic qualifications
Evidence of facility in English
Citizenship or permanent residency in Canada
6 months of employment experience in Canada
Citizenship or permanent residency in Canada
OR
Membership in an architects' organization recognized by Council
Citizenship or permanent residency in Canada
OR
Membership in an architects' organization recognized by Council
<--
<--
Successful completion of admission course 1
18 months of employment experience in Canada
Successful completion of admission course 2
3 years of employment experience, 6 months of which is in Ontario
?
?
<--
<--
Received training and experience satisfactory to the Board
Issuance of a licence

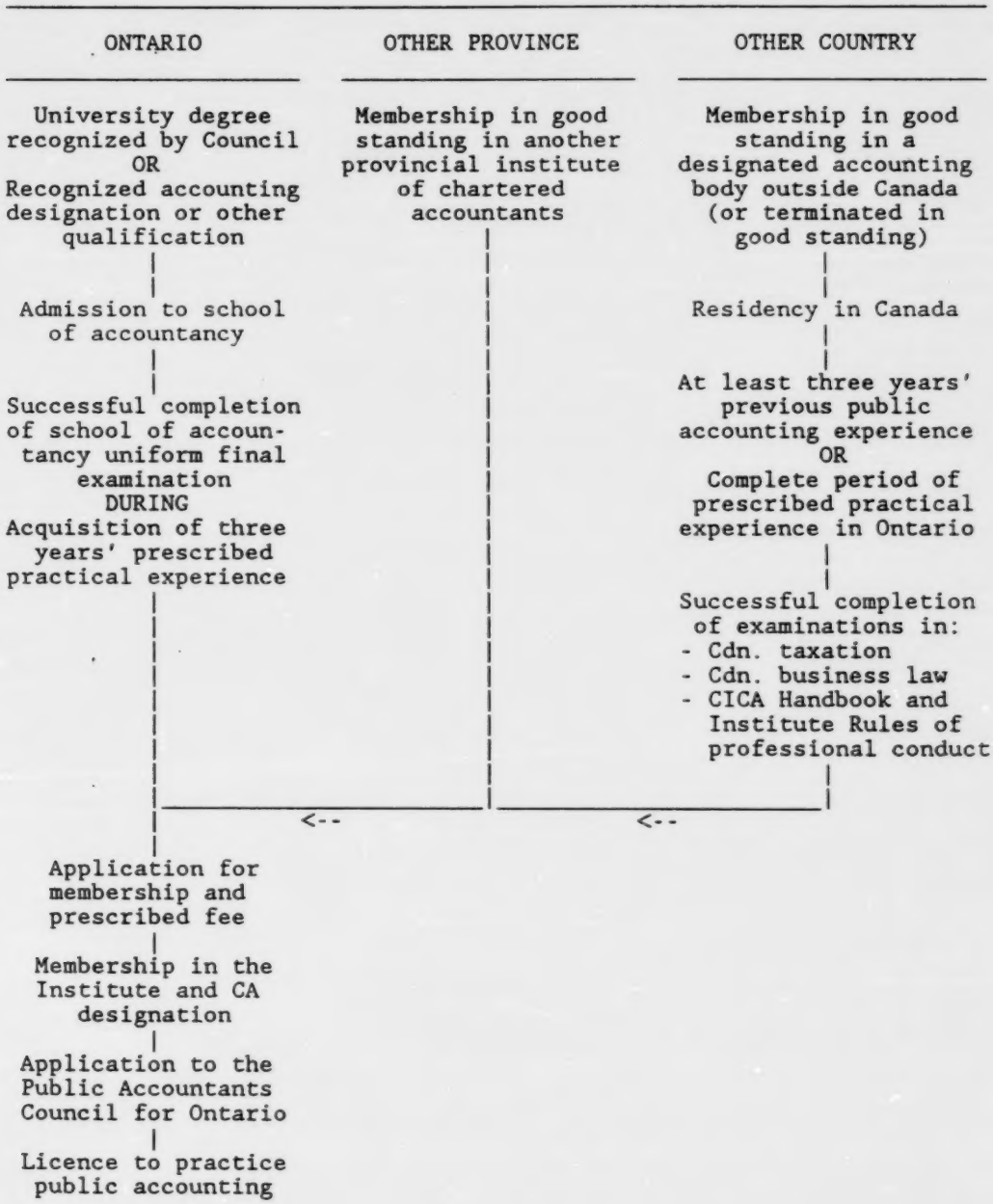
NOTE: This chart represents our interpretation of the relevant Act and Regulations. The Ontario Association of Architects did not reply to our request for confirmation in time for publication. The main unresolved issue concerns the Council's practice of granting exemptions from academic or work requirements.

PROCESS OF ENTRY TO PRACTICE AS A CERTIFIED GENERAL ACCOUNTANT IN ONTARIO


ONTARIO
OTHER JURISDICTION
Ontario Secondary School Graduation
Equivalent of Ontario Secondary School Graduation
<--
Successful completion of CGAA academic program (Exemptions may be granted, by course, for courses taken at post-secondary institutions or through other professional accounting associations, in Canada and elsewhere. Challenge exams are available if equivalency in doubt
Accounting training required for designation
Recognized professional accounting designation
Challenge two CGAA examinations and take two other CGA courses and related examinations (advanced accounting, auditing, taxation)
Two years' successful experience in relevant practical employment (at least one of which in Canada)
Two years' successful experience in relevant practical employment (at least one of which in Canada)
<--
Good character
At least 18 years of age
Membership in Certified General Accountants Association of Ontario

NOTE: The CGA Association gives members exclusive right to the designation "CGA," certified general accountant. It does not regulated public accounting practice in Ontario. (See "Chartered Accountants.")

## PROCESS OF ENTRY TO PRACTICE AS A CHARTERED ACCOUNTANT IN ONTARIO


ONTARIO
OTHER PROVINCE
OTHER COUNTRY
University degree recognized by Council
OR
Recognized accounting designation or other qualification
Admission to school of accountancy
Successful completion of school of accountancy uniform final examination
DURING
Acquisition of three years' prescribed practical experience
Membership in good standing in another provincial institute of chartered accountants
Membership in good standing in a designated accounting body outside Canada (or terminated in good standing)
Residency in Canada
At least three years' previous public accounting experience
OR
Complete period of prescribed practical experience in Ontario
Successful completion of examinations in:
- Cdn. taxation
- Cdn. business law
- CICA Handbook and Institute Rules of professional conduct
<--
<--
Application for membership and prescribed fee
Membership in the Institute and CA designation
Application to the Public Accountants Council for Ontario
Licence to practice public accounting

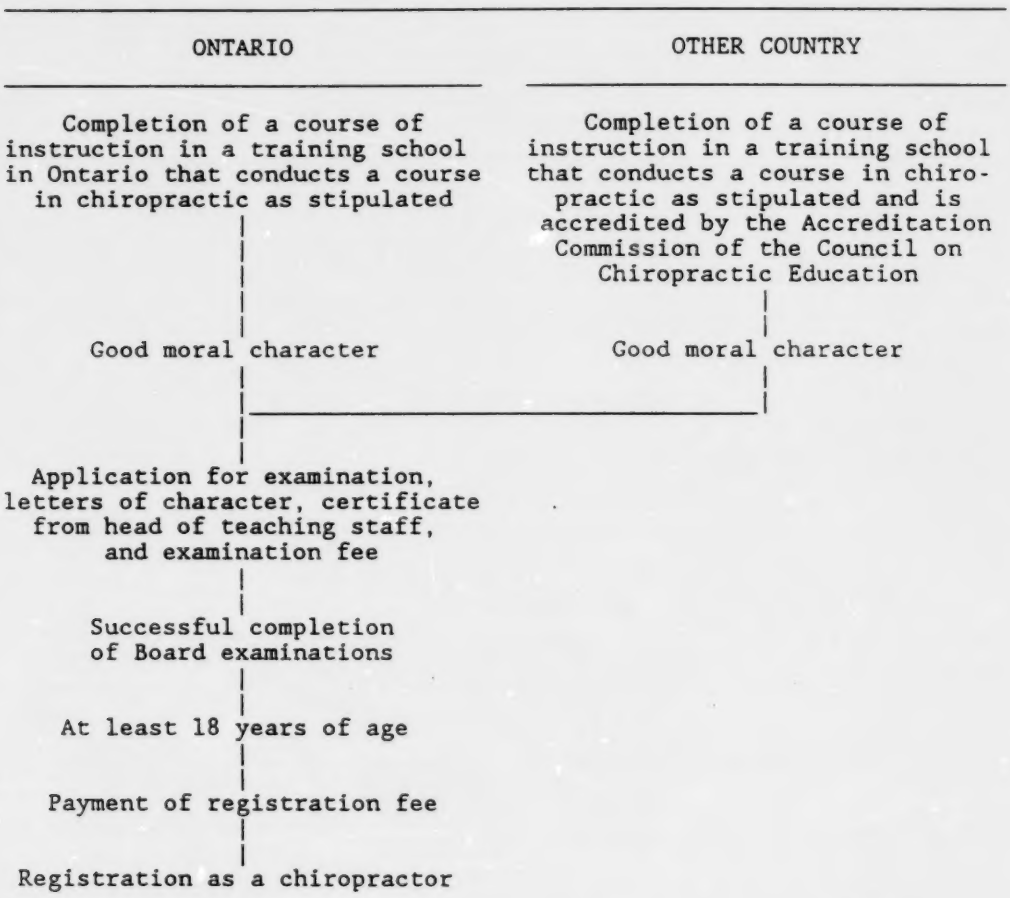
## PROCESS OF ENTRY TO PRACTICE AS A CHIROPODIST IN ONTARIO

| ONTARIO | OTHER PROVINCE | OTHER COUNTRY |
|---|---|---|
| Grade 13 with appropriate subjects | Educational standing deemed equivalent | Educational standing deemed equivalent |
| Good moral character | Good moral character | Good moral character |
| Graduation from an approved school, college or university | Graduation from an approved school, college or university | Graduation from an approved school, college or university |
| | <-- | <-- |
| Application with: two character references, evidence of academic training, certificate of internship, examination fee, and an unmounted photograph | | |
| Notification of time and place of the examination(s) | | |
| Successful completion of Board examinations | | |
| 21 or more years of age | | |
| Evidence of 3 months' clinical experience under a registered chiropodist | | |
| Payment of registration fee | | |
| Registration to practise as a Chiropodist | | |

NOTE: (1) It is not clear whether any particular level of language proficiency is required.

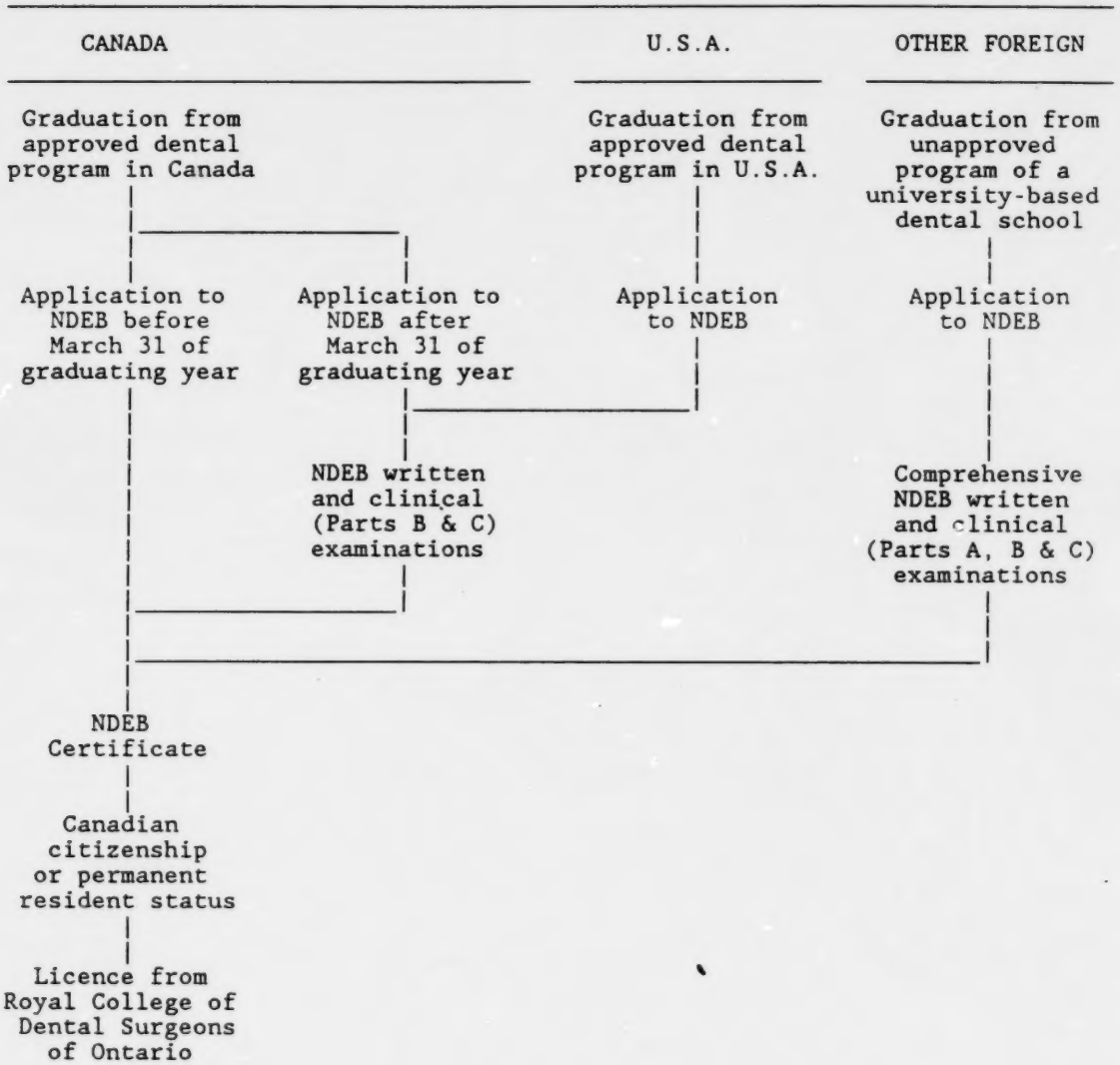
(2) This chart represents our understanding of the relevant Act and Regulations. We were unable to contact the Board of Regents of Chiropody in time for publication.

## PROCESS OF ENTRY TO PRACTICE AS A CHIROPRACTOR IN ONTARIO


ONTARIO
OTHER COUNTRY
Completion of a course of instruction in a training school in Ontario that conducts a course in chiropractic as stipulated
Completion of a course of instruction in a training school that conducts a course in chiropractic as stipulated and is accredited by the Accreditation Commission of the Council on Chiropractic Education
Good moral character
Good moral character
Application for examination, letters of character, certificate from head of teaching staff, and examination fee
Successful completion of Board examinations
At least 18 years of age
Payment of registration fee
Registration as a chiropractor

NOTE: No particular level of language proficiency is required.

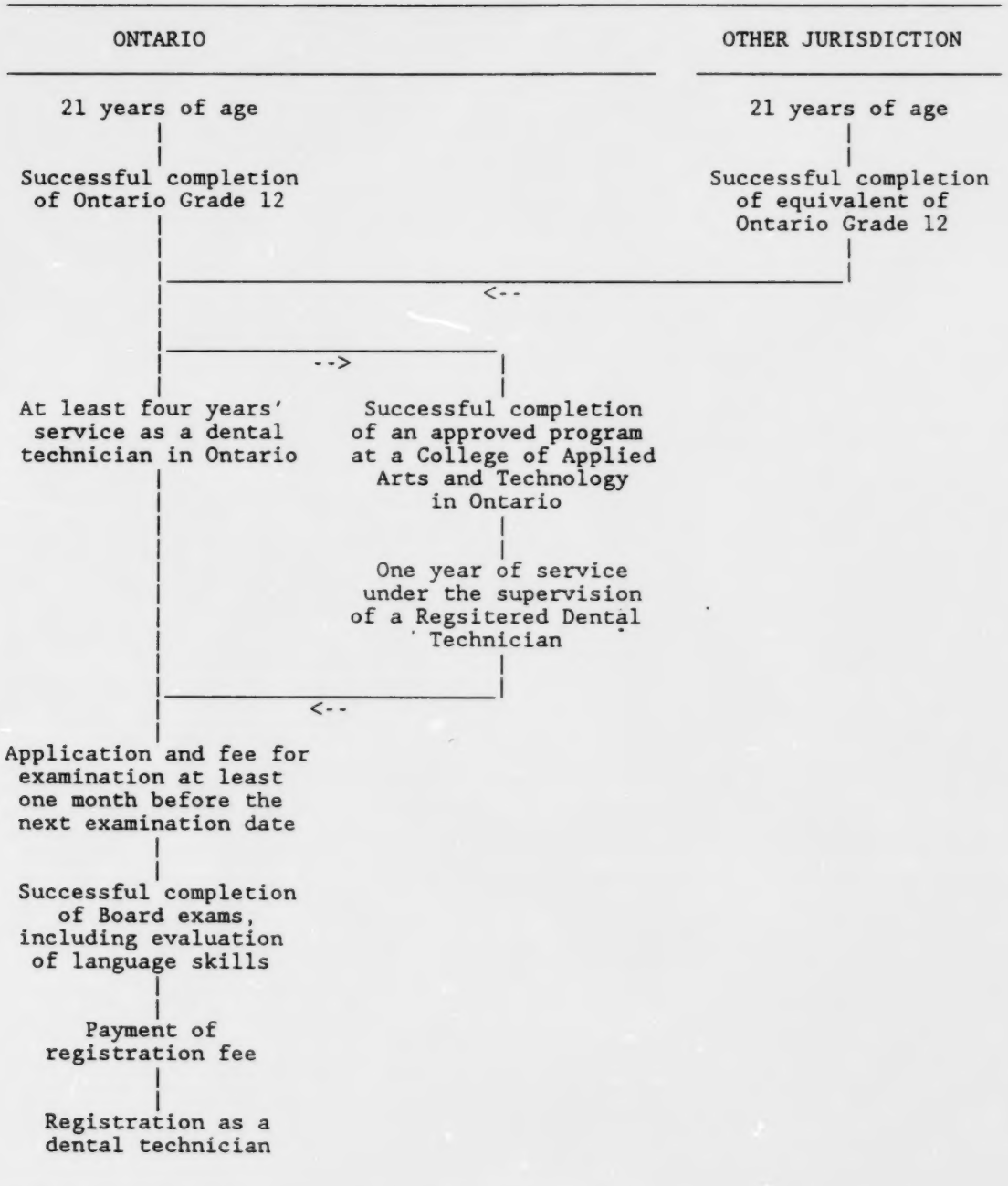
## PROCESS OF ENTRY TO PRACTICE AS A DENTAL SURGEON IN ONTARIO


CANADA
U.S.A.
OTHER FOREIGN
Graduation from approved dental program in Canada
Graduation from approved dental program in U.S.A.
Graduation from unapproved program of a university-based dental school
Application to NDEB before March 31 of graduating year
Application to NDEB after March 31 of graduating year
Application to NDEB
Application to NDEB
NDEB written and clinical (Parts B & C) examinations
Comprehensive NDEB written and clinical (Parts A, B & C) examinations
NDEB Certificate
Canadian citizenship or permanent resident status
Licence from Royal College of Dental Surgeons of Ontario

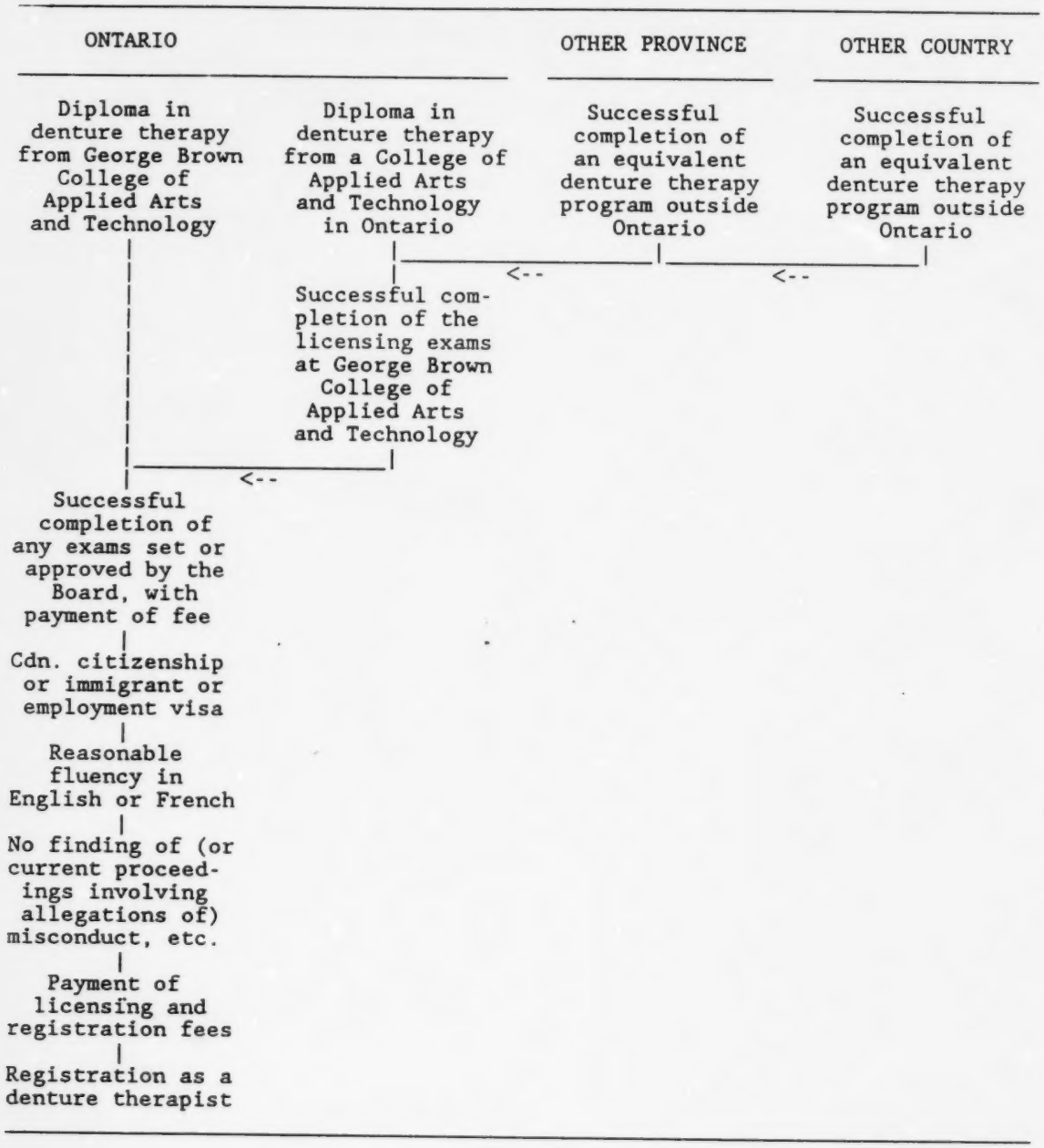
NOTE: This chart conveys our interpretation of the relevant Act and Regulations. The Royal College of Dental Surgeons of Ontario returned this version without comment.

NDEB - National Dental Examining Board

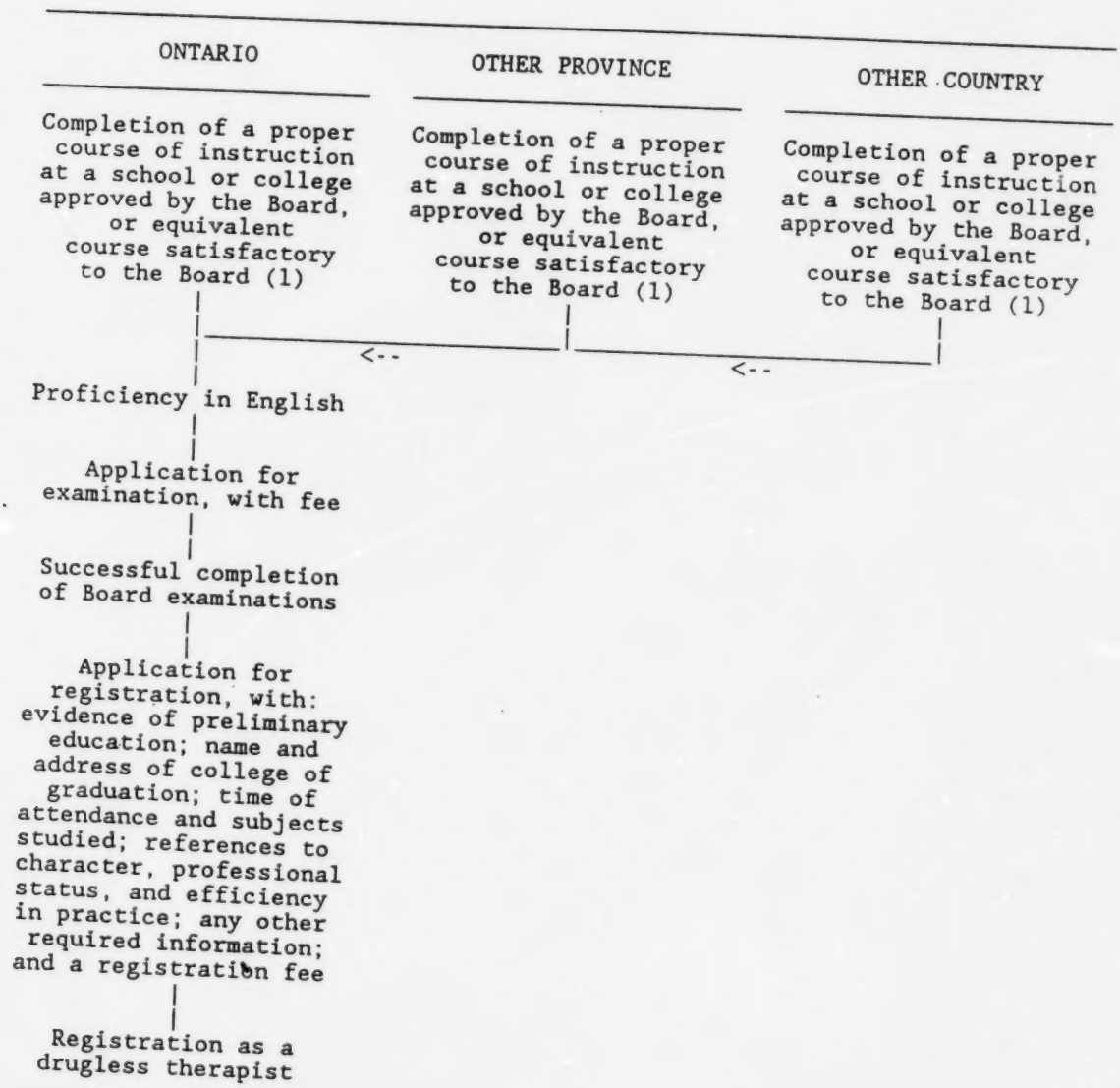
PROCESS OF ENTRY TO PRACTICE AS A DENTAL TECHNICIAN IN ONTARIO


ONTARIO
OTHER JURISDICTION
21 years of age
21 years of age
Successful completion of Ontario Grade 12
Successful completion of equivalent of Ontario Grade 12
<--
-->
At least four years' service as a dental technician in Ontario
Successful completion of an approved program at a College of Applied Arts and Technology in Ontario
One year of service under the supervision of a Regsitered Dental Technician
<--
Application and fee for examination at least one month before the next examination date
Successful completion of Board exams, including evaluation of language skills
Payment of registration fee
Registration as a dental technician

PROCESS OF ENTRY TO PRACTICE AS A DENTURE THERAPIST IN ONTARIO

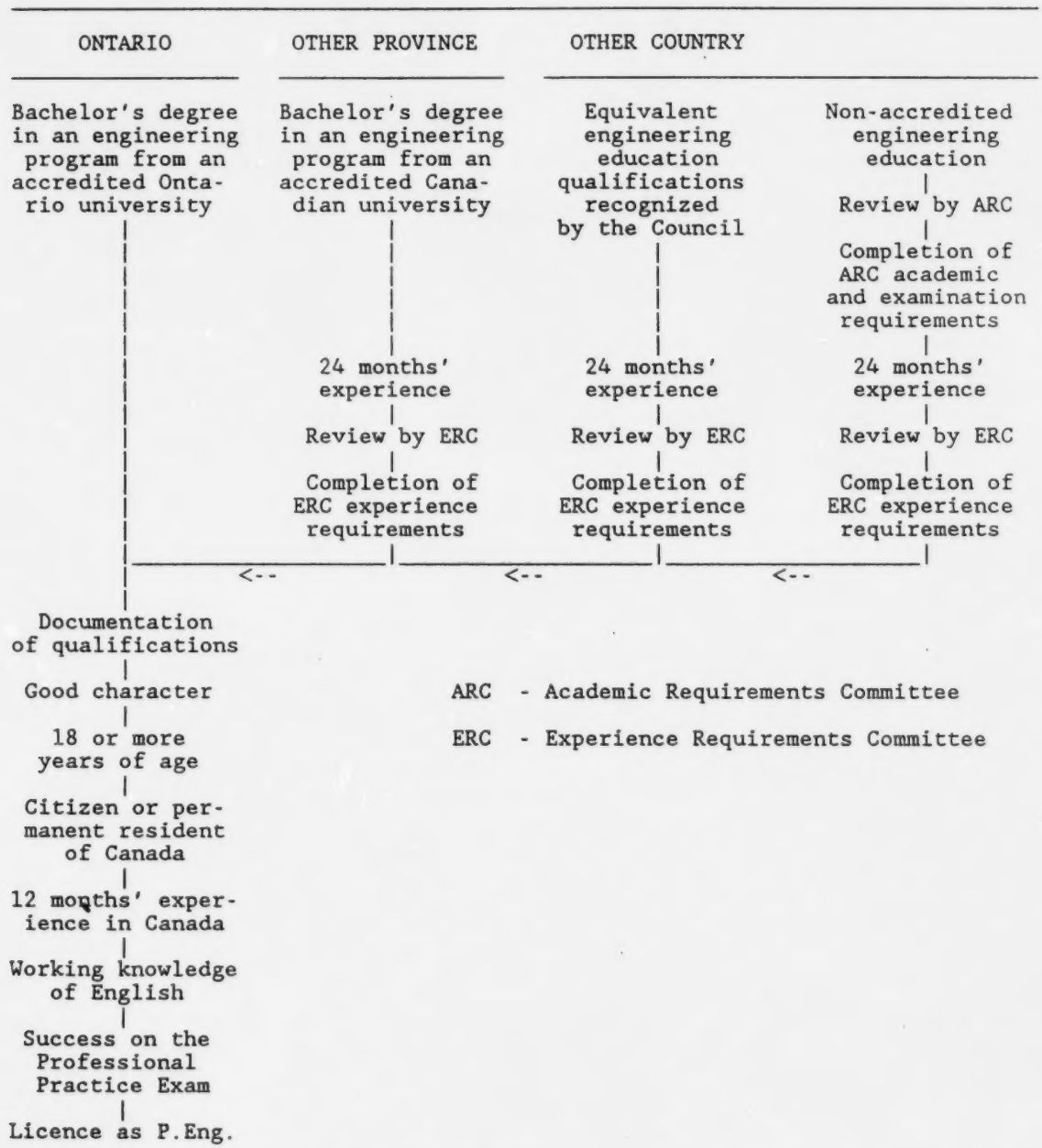

ONTARIO
OTHER PROVINCE
OTHER COUNTRY
Diploma in denture therapy from George Brown College of Applied Arts and Technology
Diploma in denture therapy from a College of Applied Arts and Technology in Ontario
Successful completion of an equivalent denture therapy program outside Ontario
Successful completion of an equivalent denture therapy program outside Ontario
<--
<--
Successful completion of the licensing exams at George Brown College of Applied Arts and Technology
<--
Successful completion of any exams set or approved by the Board, with payment of fee
Cdn. citizenship or immigrant or employment visa
Reasonable fluency in English or French
No finding of (or current proceedings involving allegations of) misconduct, etc.
Payment of licensing and registration fees
Registration as a denture therapist

## PROCESS OF ENTRY TO PRACTICE AS A DRUGLESS THERAPIST IN ONTARIO


ONTARIO
OTHER PROVINCE
OTHER COUNTRY
Completion of a proper course of instruction at a school or college approved by the Board, or equivalent course satisfactory to the Board (1)
Completion of a proper course of instruction at a school or college approved by the Board, or equivalent course satisfactory to the Board (1)
Completion of a proper course of instruction at a school or college approved by the Board, or equivalent course satisfactory to the Board (1)
<--
<--
Proficiency in English
Application for examination, with fee
Successful completion of Board examinations
Application for registration, with: evidence of preliminary education; name and address of college of graduation; time of attendance and subjects studied; references to character, professional status, and efficiency in practice; any other required information; and a registration fee
Registration as a drugless therapist

NOTE: Course must be at least four years of nine months in each year and at least 4,200 fifty-minute hours.

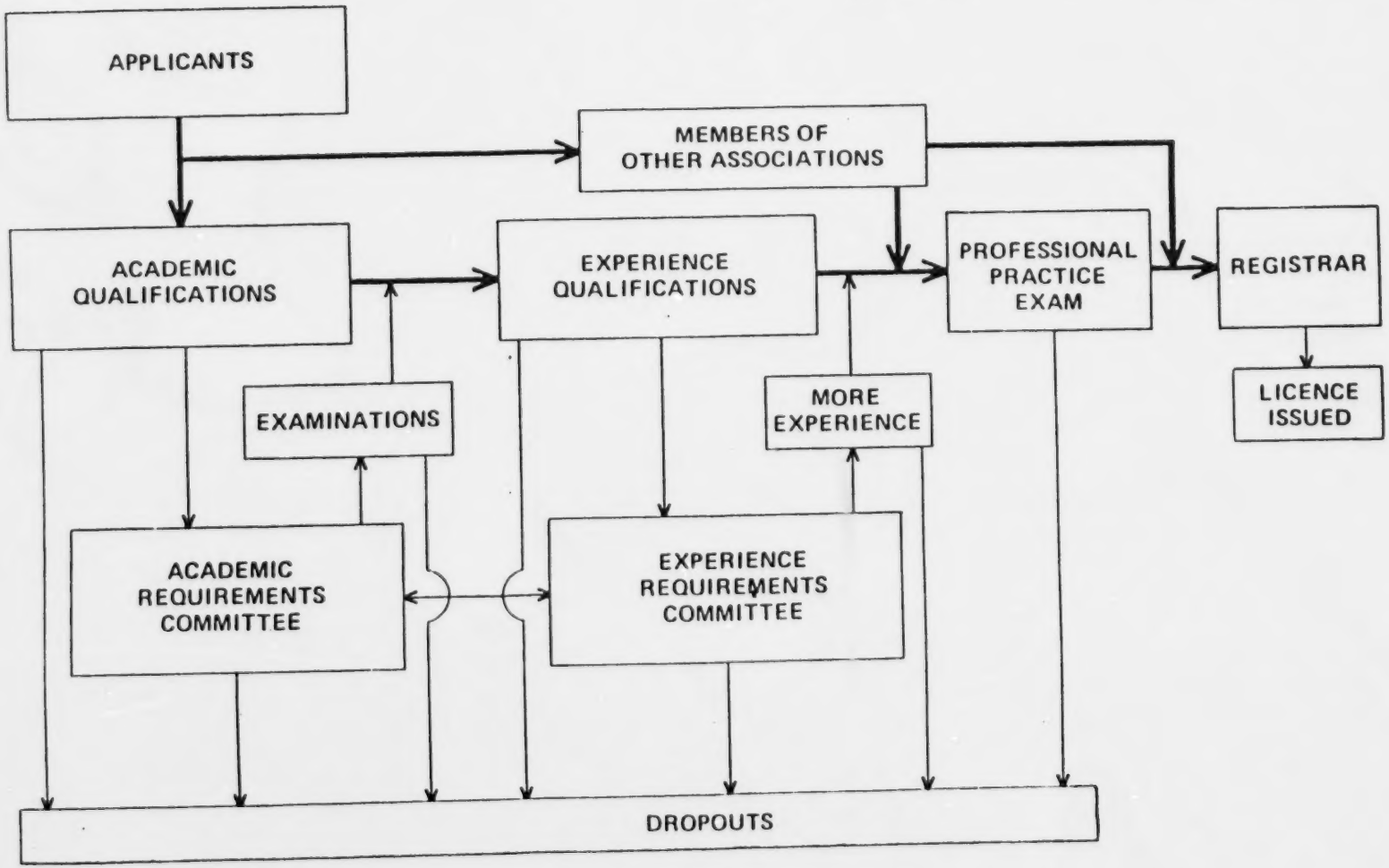
## PROCESS OF ENTRY TO PRACTICE AS AN ENGINEER IN ONTARIO


ONTARIO
OTHER PROVINCE
OTHER COUNTRY
Bachelor's degree in an engineering program from an accredited Ontario university
Bachelor's degree in an engineering program from an accredited Canadian university
Equivalent engineering education qualifications recognized by the Council
Non-accredited engineering education
Review by ARC
Completion of ARC academic and examination requirements
24 months' experience
24 months' experience
24 months' experience
Review by ERC
Review by ERC
Review by ERC
Completion of ERC experience requirements
Completion of ERC experience requirements
Completion of ERC experience requirements
<--
<--
<--
Documentation of qualifications
Good character
18 or more years of age
Citizen or permanent resident of Canada
12 months' experience in Canada
Working knowledge of English
Success on the Professional Practice Exam
Licence as P.Eng.
ARC - Academic Requirements Committee
ERC - Experience Requirements Committee

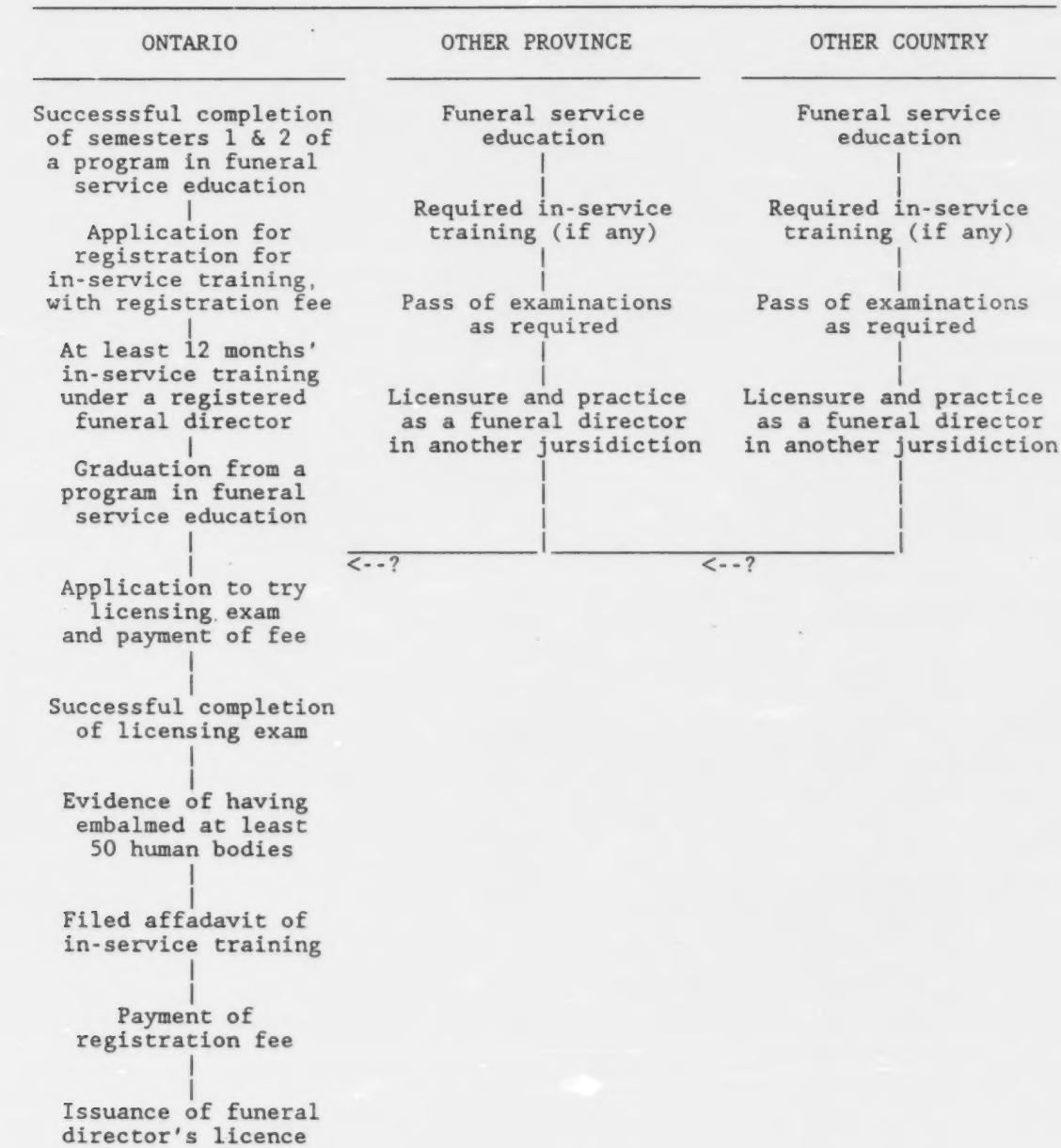
NOTE: This chart reflects our interpretation of the relevant Act and Regulations. The Association of Professional Engineers described it as "totally inaccurate," and provided a chart of its own. But the APEO chart does not distinguish bewteen Canadian- and foreign-trained applicants. Therefore, we have include both charts in this appendix.

# Admissions Process

## Simplified Flow Diagram

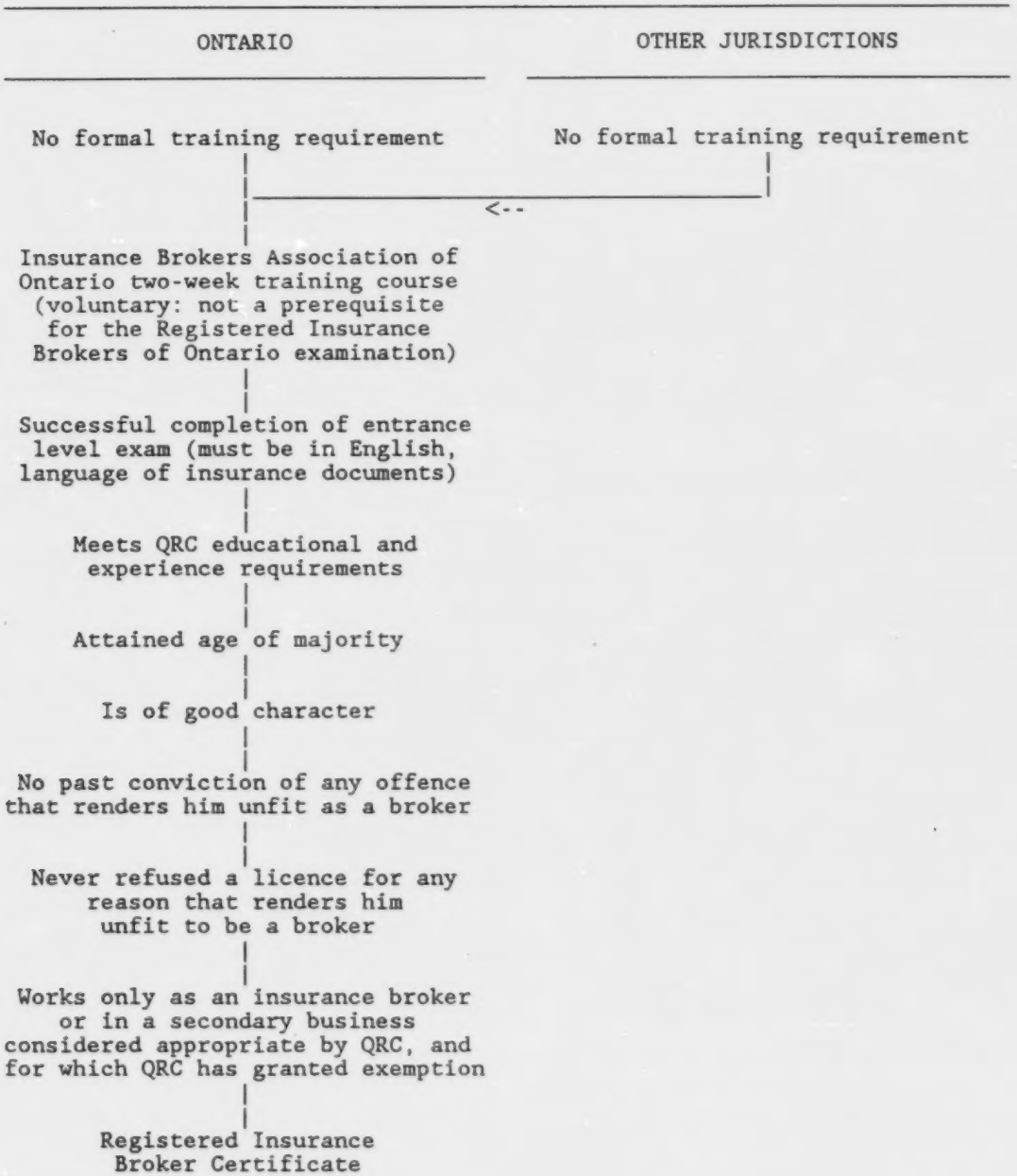


## PROCESS OF ENTRY TO PRACTICE AS A FUNERAL DIRECTOR IN ONTARIO


ONTARIO
OTHER PROVINCE
OTHER COUNTRY
Successful completion of semesters 1 & 2 of a program in funeral service education
Application for registration for in-service training, with registration fee
At least 12 months' in-service training under a registered funeral director
Graduation from a program in funeral service education
Application to try licensing exam and payment of fee
Successful completion of licensing exam
Evidence of having embalmed at least 50 human bodies
Filed affadavit of in-service training
Payment of registration fee
Issuance of funeral director's licence
Funeral service education
Required in-service training (if any)
Pass of examinations as required
Licensure and practice as a funeral director in another jursidiction
Funeral service education
Required in-service training (if any)
Pass of examinations as required
Licensure and practice as a funeral director in another jursidiction
<--?
<--?

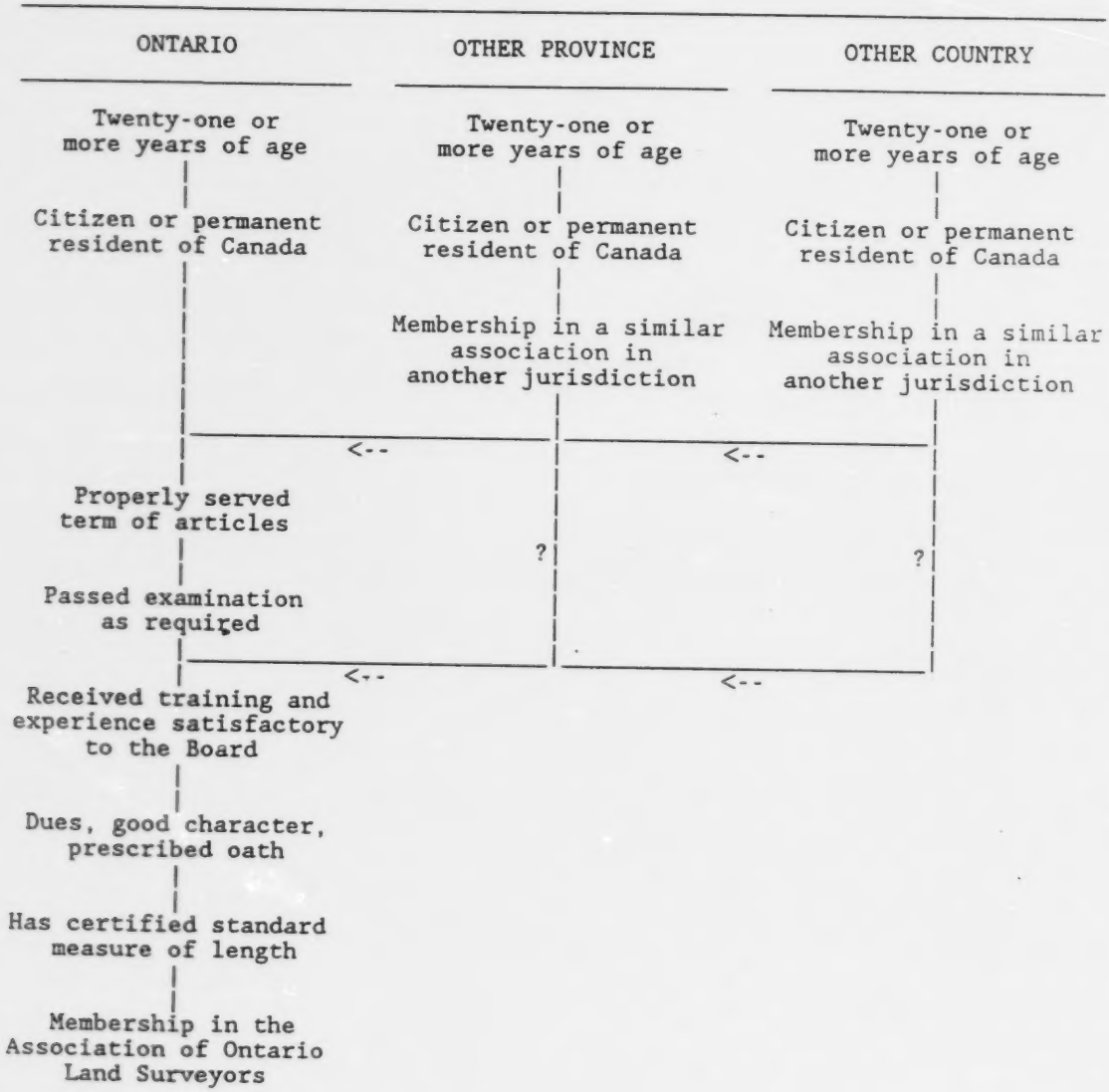
NOTE: This chart reflects our understanding of the relevant Act and Regulations. The Board of Funeral Services did not respond to our request for confirmation.

PROCESS OF ENTRY TO PRACTICE AS AN INSURANCE BROKER IN ONTARIO


ONTARIO
OTHER JURISDICTIONS
No formal training requirement
No formal training requirement
Insurance Brokers Association of Ontario two-week training course (voluntary: not a prerequisite for the Registered Insurance Brokers of Ontario examination)
Successful completion of entrance level exam (must be in English, language of insurance documents)
Meets QRC educational and experience requirements
Attained age of majority
Is of good character
No past conviction of any offence that renders him unfit as a broker
Never refused a licence for any reason that renders him unfit to be a broker
Works only as an insurance broker or in a secondary business considered appropriate by QRC, and for which QRC has granted exemption
Registered Insurance Broker Certificate

QRC - Qualification and Registration Committee

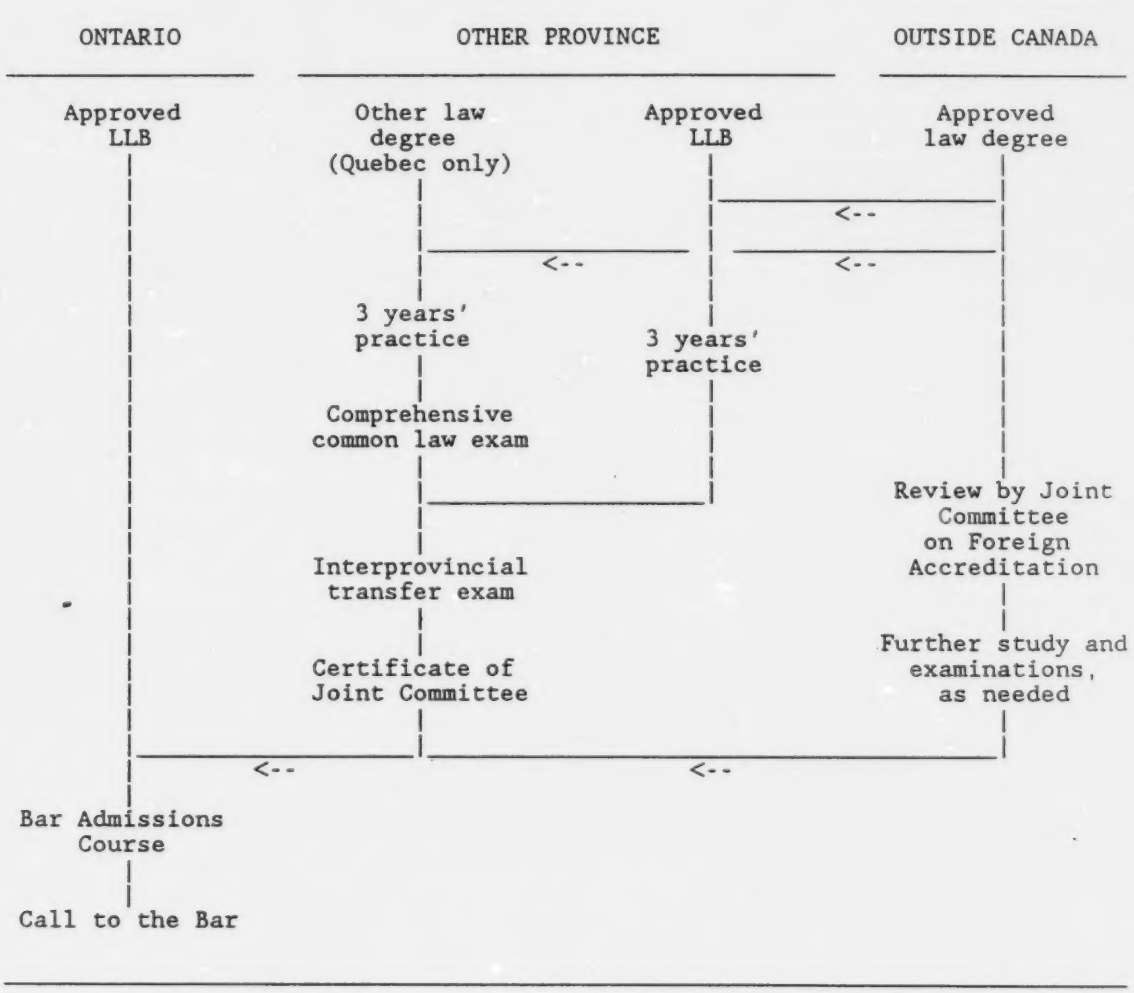
PROCESS OF ENTRY TO PRACTICE AS A LAND SURVEYOR IN ONTARIO


ONTARIO
OTHER PROVINCE
OTHER COUNTRY
Twenty-one or more years of age
Twenty-one or more years of age
Twenty-one or more years of age
Citizen or permanent resident of Canada
Citizen or permanent resident of Canada
Citizen or permanent resident of Canada
Membership in a similar association in another jurisdiction
Membership in a similar association in another jurisdiction
<--
<--
Properly served term of articles
?
?
Passed examination as required
<--
<--
Received training and experience satisfactory to the Board
Dues, good character, prescribed oath
Has certified standard measure of length
Membership in the Association of Ontario Land Surveyors

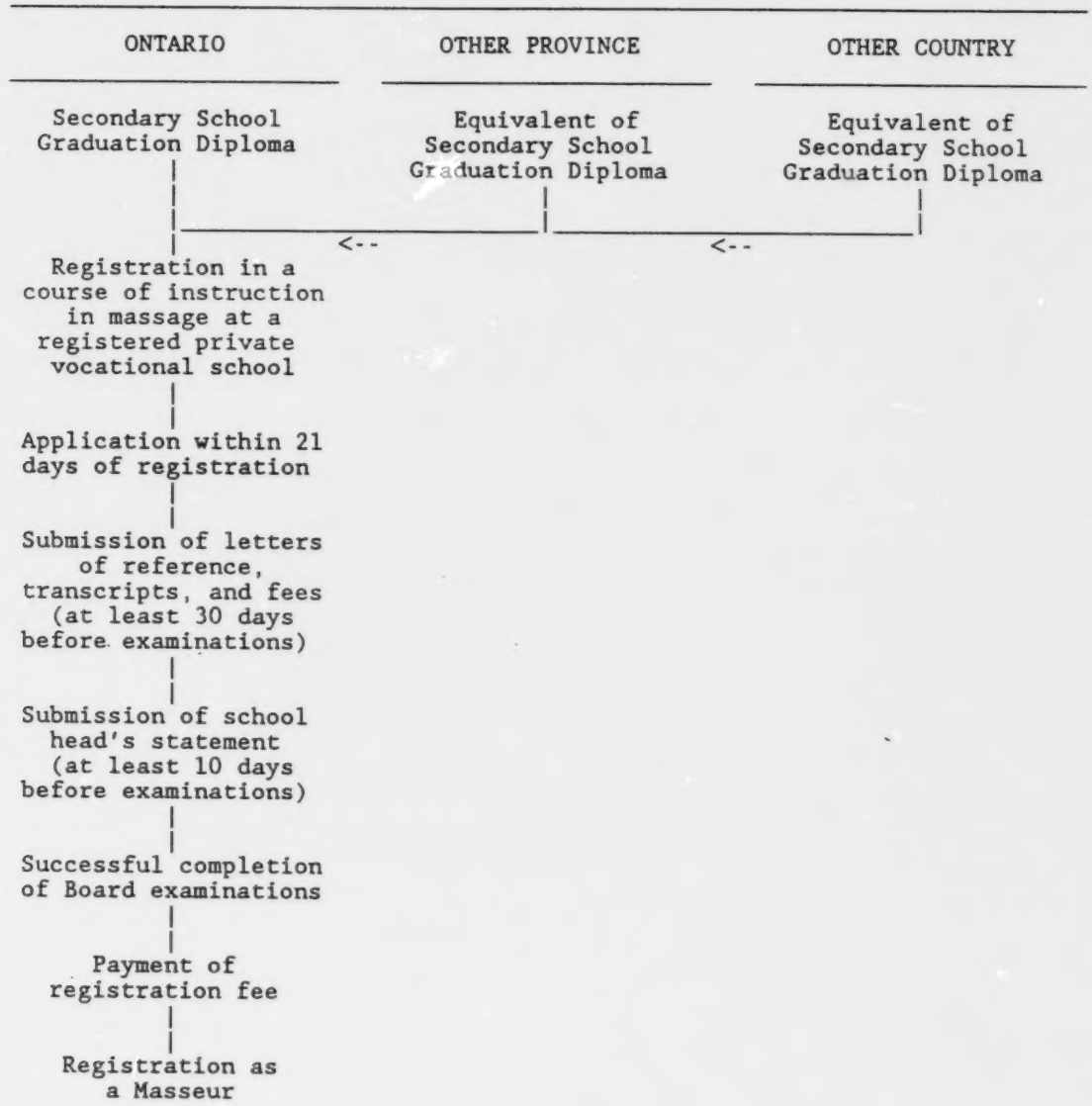
NOTES:

1. It is not clear whether foreign-trained applicants can bypass examinations or articles.
2. This chart conveys our interpretation of the relevant Act and Regulations. We were unable to contact the Association of Land Surveyors.

PROCESS OF ENTRY TO PRACTICE AS A LAWYER IN ONTARIO

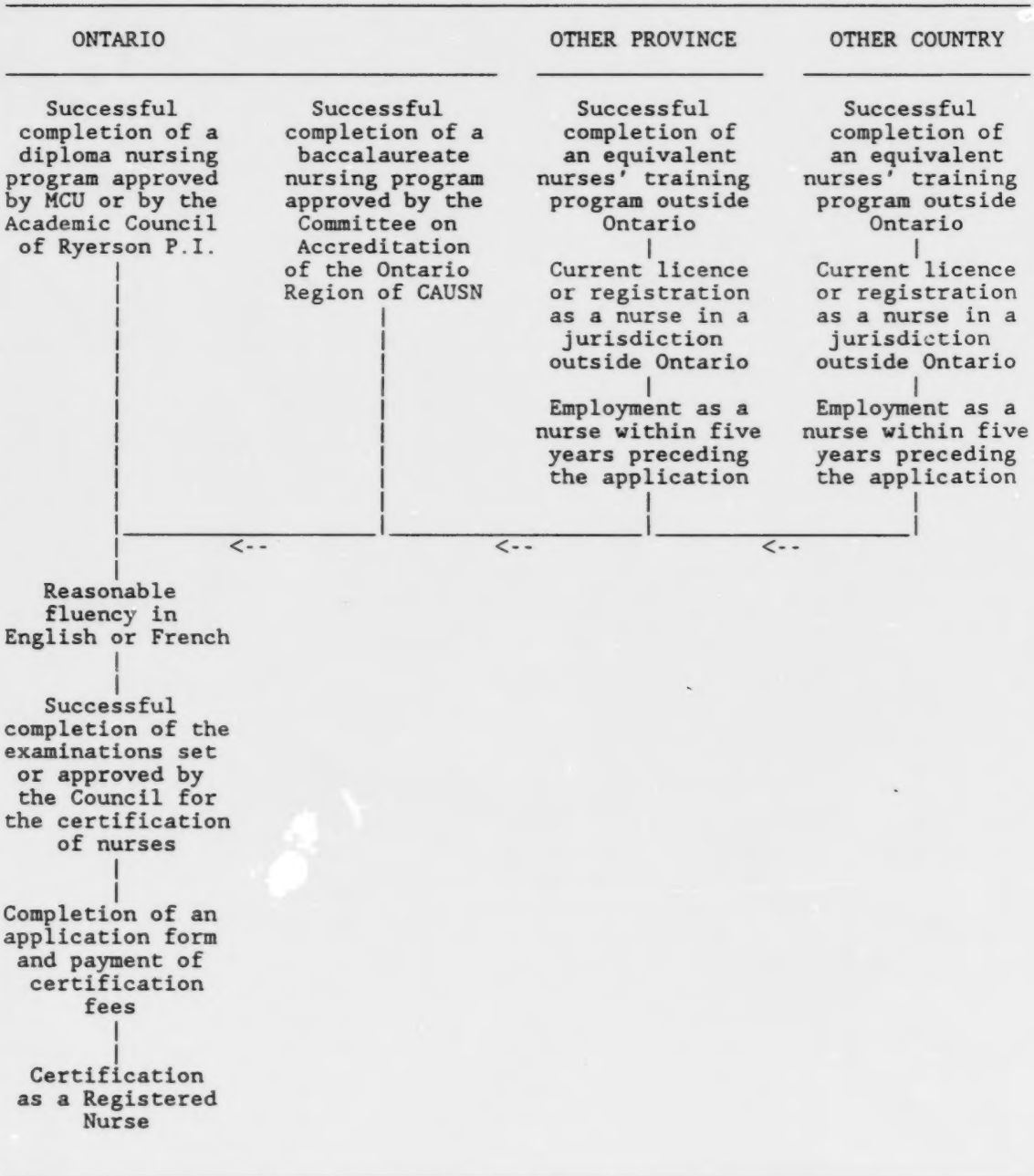


## PROCESS OF ENTRY TO PRACTICE AS A MASSEUR IN ONTARIO

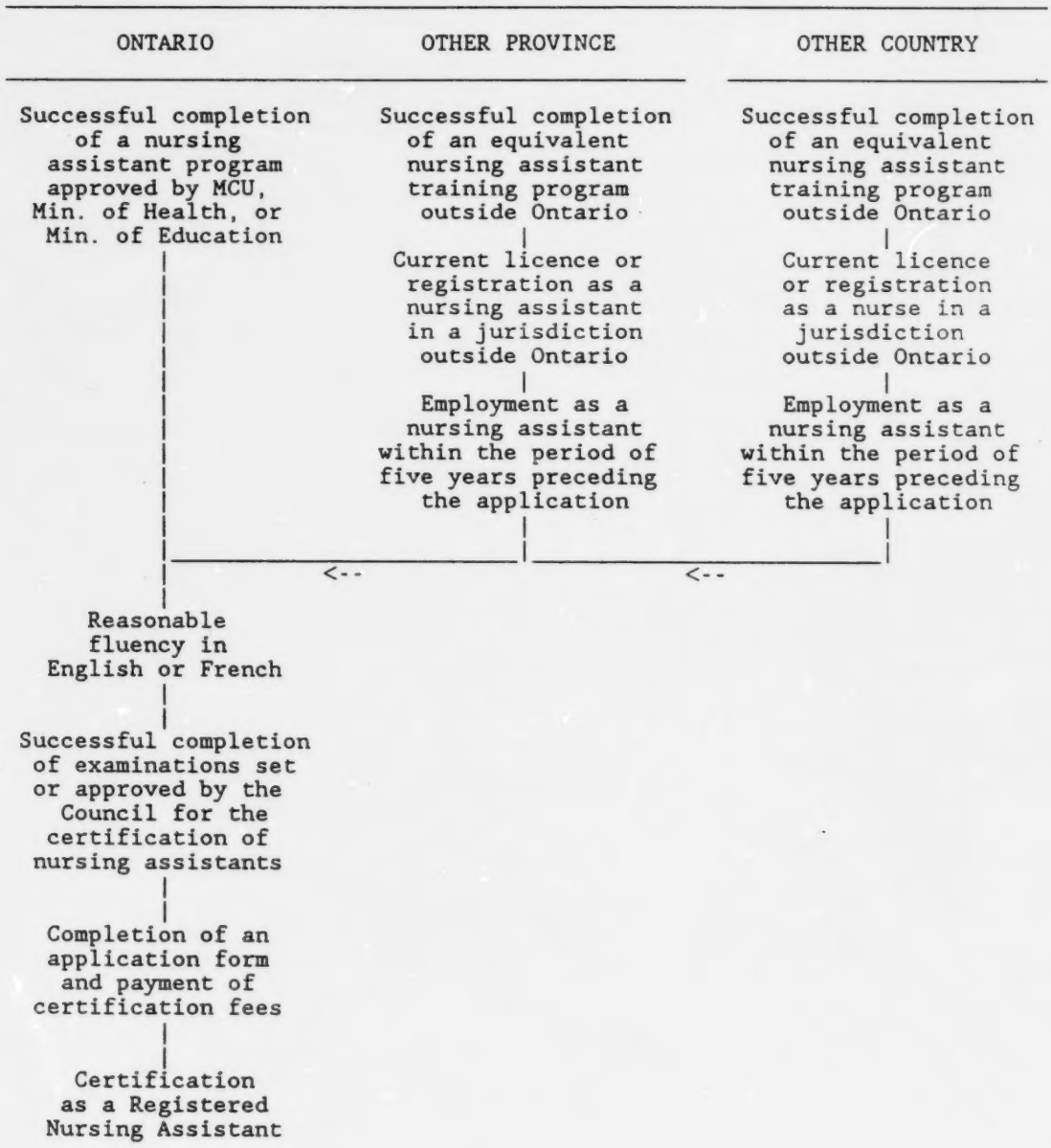

ONTARIO
OTHER PROVINCE
OTHER COUNTRY
Secondary School Graduation Diploma
Equivalent of Secondary School Graduation Diploma
Equivalent of Secondary School Graduation Diploma
<--
<--
Registration in a course of instruction in massage at a registered private vocational school
Application within 21 days of registration
Submission of letters of reference, transcripts, and fees (at least 30 days before examinations)
Submission of school head's statement (at least 10 days before examinations)
Successful completion of Board examinations
Payment of registration fee
Registration as a Masseur

NOTES:
1. This chart reflects our understanding of the relevant Act and Regulations. The Board of Directors of Masseurs returned this version without comment.
2. It is not clear how the Board assesses training or practice as a masseur in another jurisdiction.
3. It is not clear whether the Board requires any particular level of language proficiency.

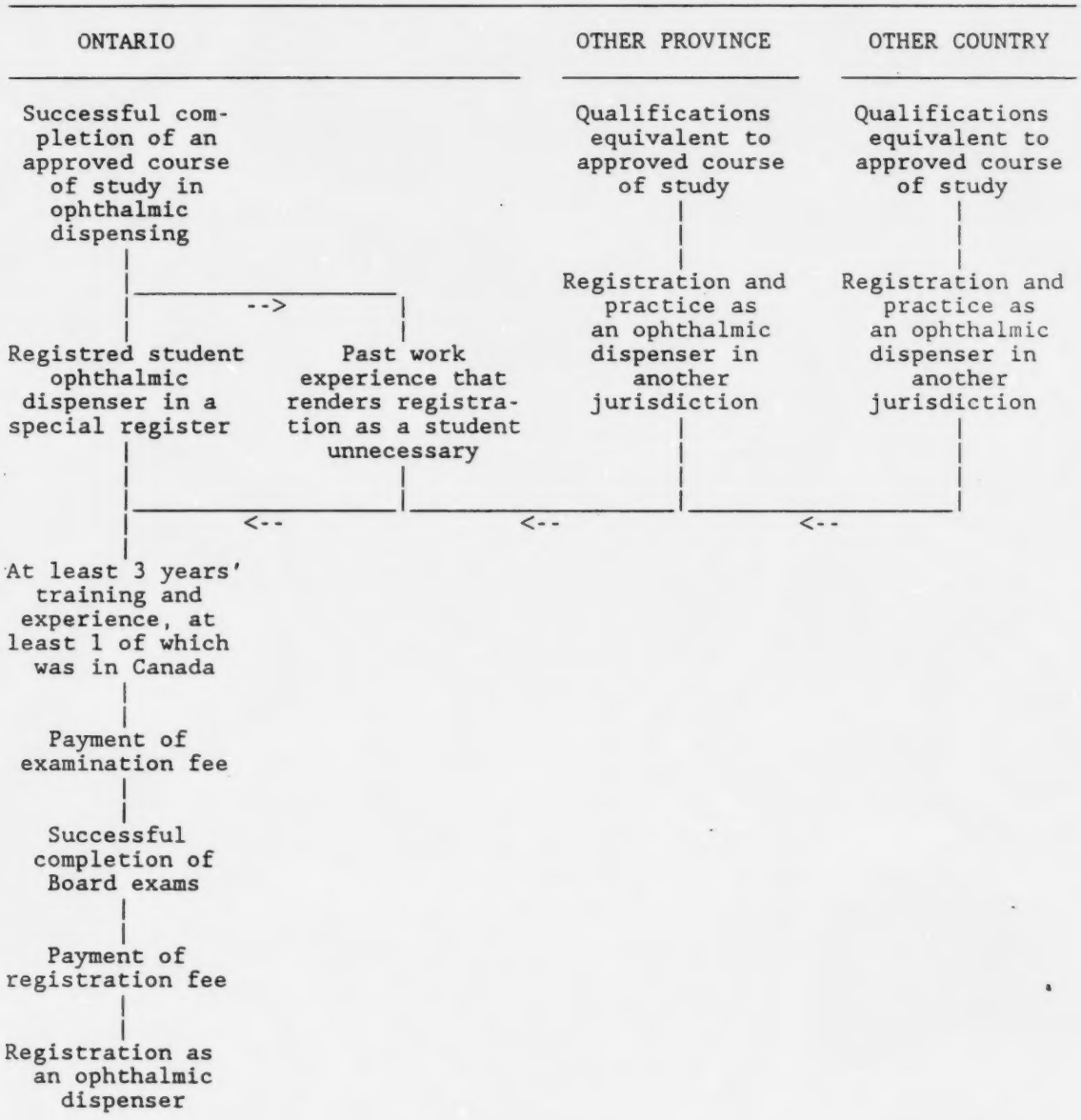
PROCESS OF ENTRY TO PRACTICE AS A NURSE IN ONTARIO


ONTARIO
OTHER PROVINCE
OTHER COUNTRY
Successful completion of a diploma nursing program approved by MCU or by the Academic Council of Ryerson P.I.
Successful completion of a baccalaureate nursing program approved by the Committee on Accreditation of the Ontario Region of CAUSN
Successful completion of an equivalent nurses' training program outside Ontario
Current licence or registration as a nurse in a jurisdiction outside Ontario
Employment as a nurse within five years preceding the application
Successful completion of an equivalent nurses' training program outside Ontario
Current licence or registration as a nurse in a jurisdiction outside Ontario
Employment as a nurse within five years preceding the application
<--
<--
<--
Reasonable fluency in English or French
Successful completion of the examinations set or approved by the Council for the certification of nurses
Completion of an application form and payment of certification fees
Certification as a Registered Nurse

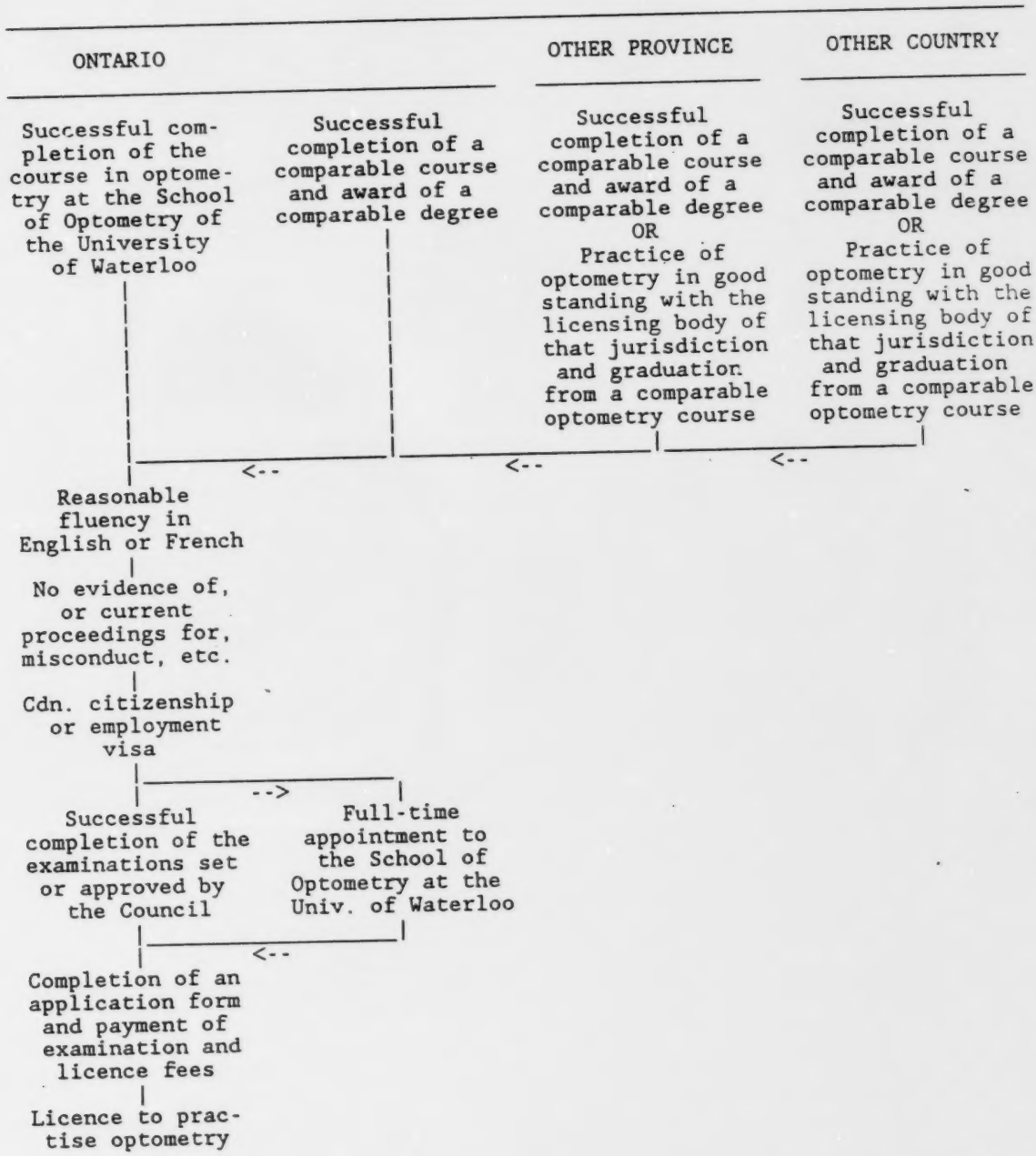
PROCESS OF ENTRY TO PRACTICE AS A NURSING ASSISTANT IN ONTARIO


ONTARIO
OTHER PROVINCE
OTHER COUNTRY
Successful completion of a nursing assistant program approved by MCU, Min. of Health, or Min. of Education
Successful completion of an equivalent nursing assistant training program outside Ontario
Current licence or registration as a nursing assistant in a jurisdiction outside Ontario
Employment as a nursing assistant within the period of five years preceding the application
Successful completion of an equivalent nursing assistant training program outside Ontario
Current licence or registration as a nurse in a jurisdiction outside Ontario
Employment as a nursing assistant within the period of five years preceding the application
<--
<--
Reasonable fluency in English or French
Successful completion of examinations set or approved by the Council for the certification of nursing assistants
Completion of an application form and payment of certification fees
Certification as a Registered Nursing Assistant

PROCESS OF ENTRY TO PRACTICE AS AN OPHTHALMIC DISPENSER IN ONTARIO

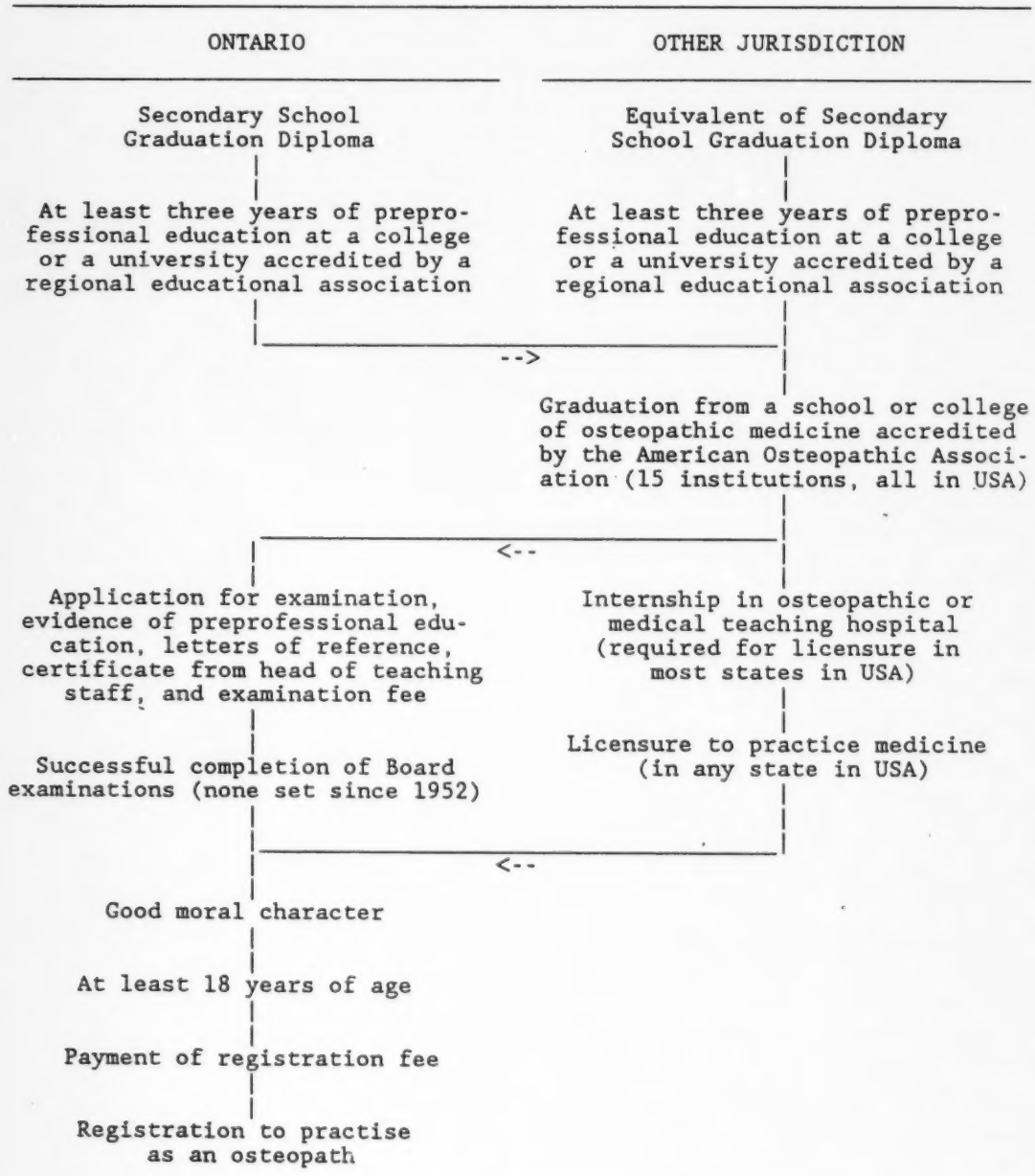

ONTARIO
OTHER PROVINCE
OTHER COUNTRY
Successful completion of an approved course of study in ophthalmic dispensing
Qualifications equivalent to approved course of study
Qualifications equivalent to approved course of study
Registred student ophthalmic dispenser in a special register
Past work experience that renders registration as a student unnecessary
Registration and practice as an ophthalmic dispenser in another jurisdiction
Registration and practice as an ophthalmic dispenser in another jurisdiction
At least 3 years' training and experience, at least 1 of which was in Canada
Payment of examination fee
Successful completion of Board exams
Payment of registration fee
Registration as an ophthalmic dispenser

PROCESS OF ENTRY TO PRACTICE AS A OPTOMETRIST IN ONTARIO




NOTE: The process does not address the opportunity for permanent residents. The College of Optometrists of Ontario has never had an applicant with that status.

PROCESS OF ENTRY TO PRACTICE AS AN OSTEOPATH IN ONTARIO


ONTARIO
OTHER JURISDICTION
Secondary School Graduation Diploma
Equivalent of Secondary School Graduation Diploma
At least three years of preprofessional education at a college or a university accredited by a regional educational association
At least three years of preprofessional education at a college or a university accredited by a regional educational association
-->
Graduation from a school or college of osteopathic medicine accredited by the American Osteopathic Association (15 institutions, all in USA)
<--
Application for examination, evidence of preprofessional education, letters of reference, certificate from head of teaching staff, and examination fee
Internship in osteopathic or medical teaching hospital (required for licensure in most states in USA)
Licensure to practice medicine (in any state in USA)
Successful completion of Board examinations (none set since 1952)
<--
Good moral character
At least 18 years of age
Payment of registration fee
Registration to practise as an osteopath

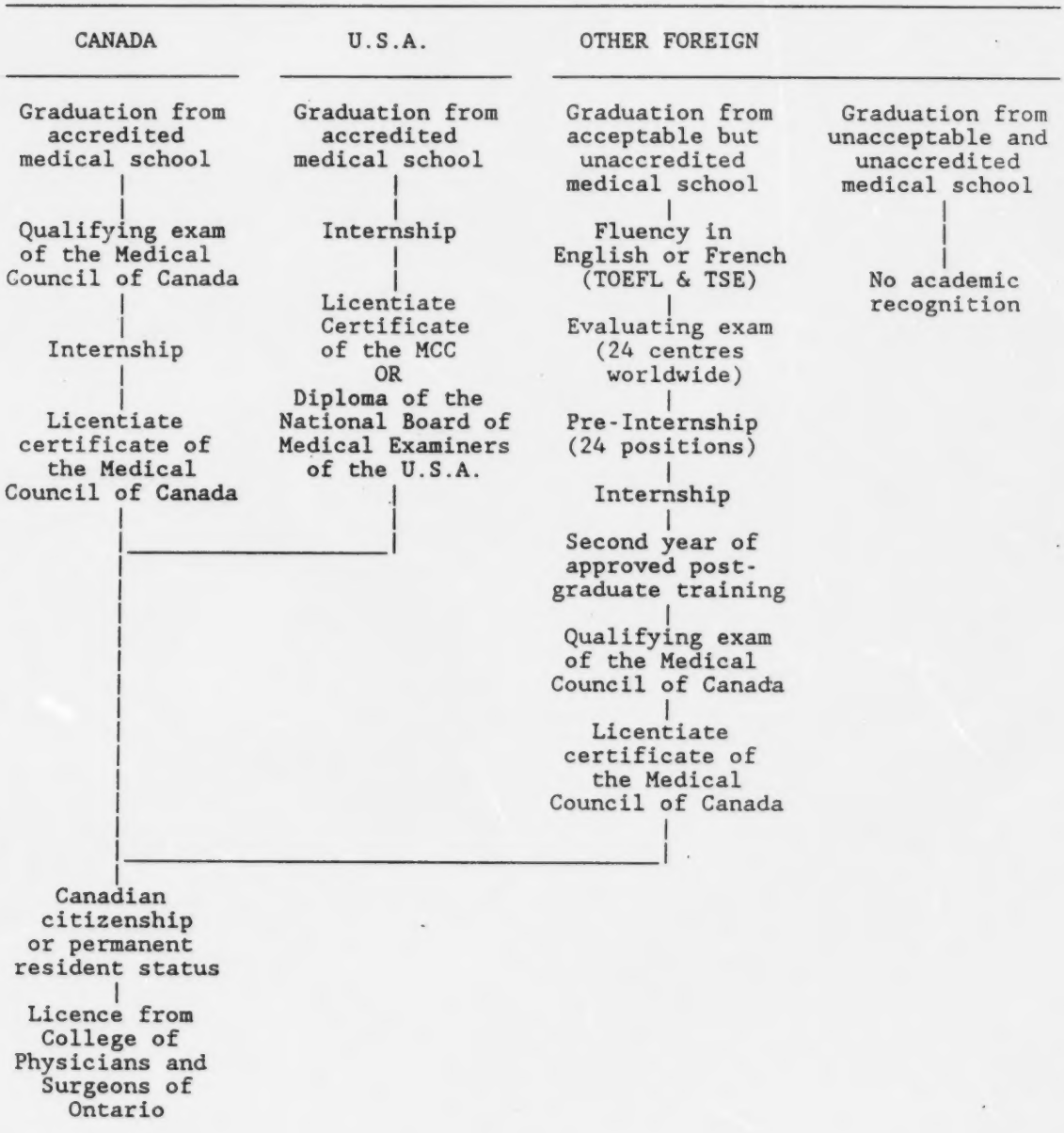
NOTE: It is not clear whether the Board of Directors of Osteopathy requires any particular level of language proficiency.

## PROCESS OF ENTRY TO PRACTICE AS A PHARMACIST IN ONTARIO

| ONTARIO | OTHER PROVINCE | US, UK, IRELAND, OR AUSTRALIA | OTHER FOREIGN COUNTRY |
|---|---|---|---|
| B.Sc.Phm. from U. of Toronto (including a course and an examination in pharmaceutical jurisprudence) within past three years (i.e. apply within two years of graduation) | B.Sc.Phm. from university within past three years (i.e. apply within two years of graduation) | Acceptable degree within past three years (i.e. apply within two years of graduation) OR Any additional required training | Acceptable degree within past three years (i.e. apply within two years of graduation) OR Any additional required training |
| | | PEBC evaluating examination | PEBC evaluating examination |
| | Examination in pharmaceutical jurisprudence | Examination in pharmaceutical jurisprudence | Examination in pharmaceutical jurisprudence |
| PEBC Certificate of Qualification | PEBC Certificate of Qualification | PEBC Certificate of Qualification | PEBC Certificate of Qualification |
| Twelve months' in-service training, of which at least 16 weeks must follow graduation | Twelve months' in-service training (up to 11 months' credit for working experience) | Twelve months' in-service training (up to 6 months' credit for working experience) | Twelve months' in-service training |
| <-- | <-- | <-- | |
| Demonstration of reasonable fluency in French or English | | | |
| Affadavit re Section 32(g) | | | |
| Canadian citizenship or immigrant or employment visa | | | |
| Payment of fees | | | |
| Licence from Ontario College of Pharmacists | | | |

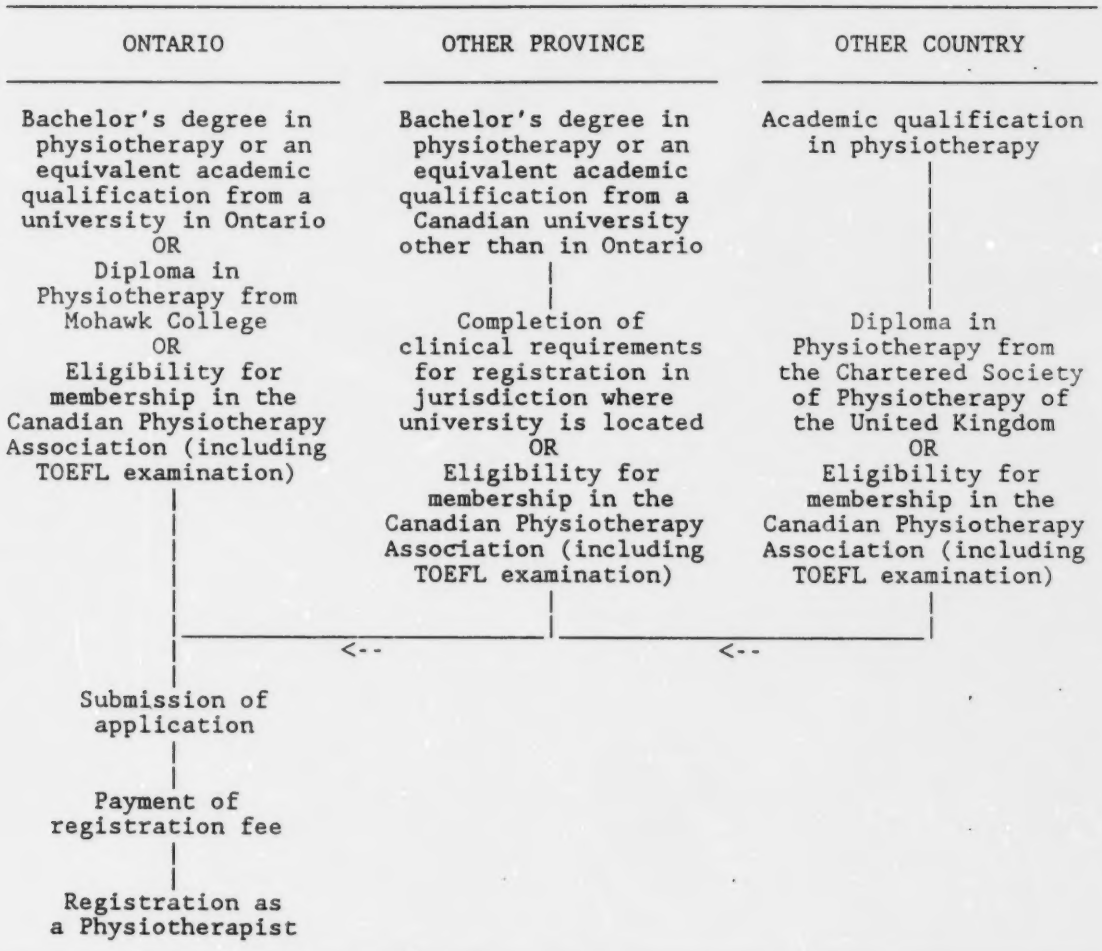
Note: Exam in pharmaceutical jurisprudence, PEBC certificate, and in-service training need not follow in the sequence shown.

## PROCESS OF ENTRY TO PRACTICE AS PHYSICIAN OR SURGEON IN ONTARIO


CANADA
U.S.A.
OTHER FOREIGN
Graduation from accredited medical school
Qualifying exam of the Medical Council of Canada
Internship
Licentiate certificate of the Medical Council of Canada
Graduation from accredited medical school
Internship
Licentiate Certificate of the MCC
OR
Diploma of the National Board of Medical Examiners of the U.S.A.
Graduation from acceptable but unaccredited medical school
Fluency in English or French (TOEFL & TSE)
Evaluating exam (24 centres worldwide)
Pre-Internship (24 positions)
Internship
Second year of approved post-graduate training
Qualifying exam of the Medical Council of Canada
Licentiate certificate of the Medical Council of Canada
Graduation from unacceptable and unaccredited medical school
No academic recognition
Canadian citizenship or permanent resident status
Licence from College of Physicians and Surgeons of Ontario

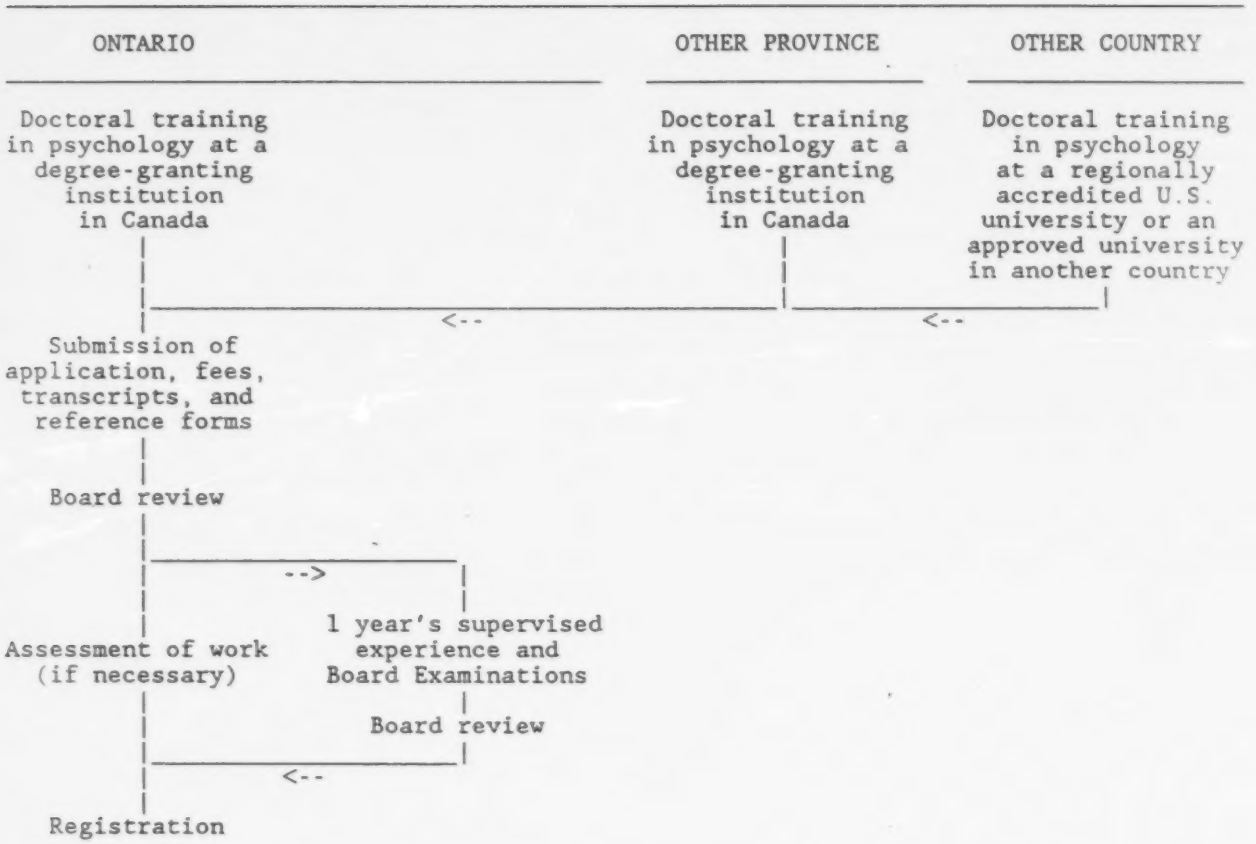
Note: The above procedure gives no explicit recognition of experience in medical practice in another country.

PROCESS OF ENTRY TO PRACTICE AS A PHYSIOTHERAPIST IN ONTARIO


ONTARIO
OTHER PROVINCE
OTHER COUNTRY
Bachelor's degree in physiotherapy or an equivalent academic qualification from a university in Ontario
OR
Diploma in Physiotherapy from Mohawk College
OR
Eligibility for membership in the Canadian Physiotherapy Association (including TOEFL examination)
Bachelor's degree in physiotherapy or an equivalent academic qualification from a Canadian university other than in Ontario
Completion of clinical requirements for registration in jurisdiction where university is located
OR
Eligibility for membership in the Canadian Physiotherapy Association (including TOEFL examination)
Academic qualification in physiotherapy
Diploma in Physiotherapy from the Chartered Society of Physiotherapy of the United Kingdom
OR
Eligibility for membership in the Canadian Physiotherapy Association (including TOEFL examination)
<--
<--
Submission of application
Payment of registration fee
Registration as a Physiotherapist

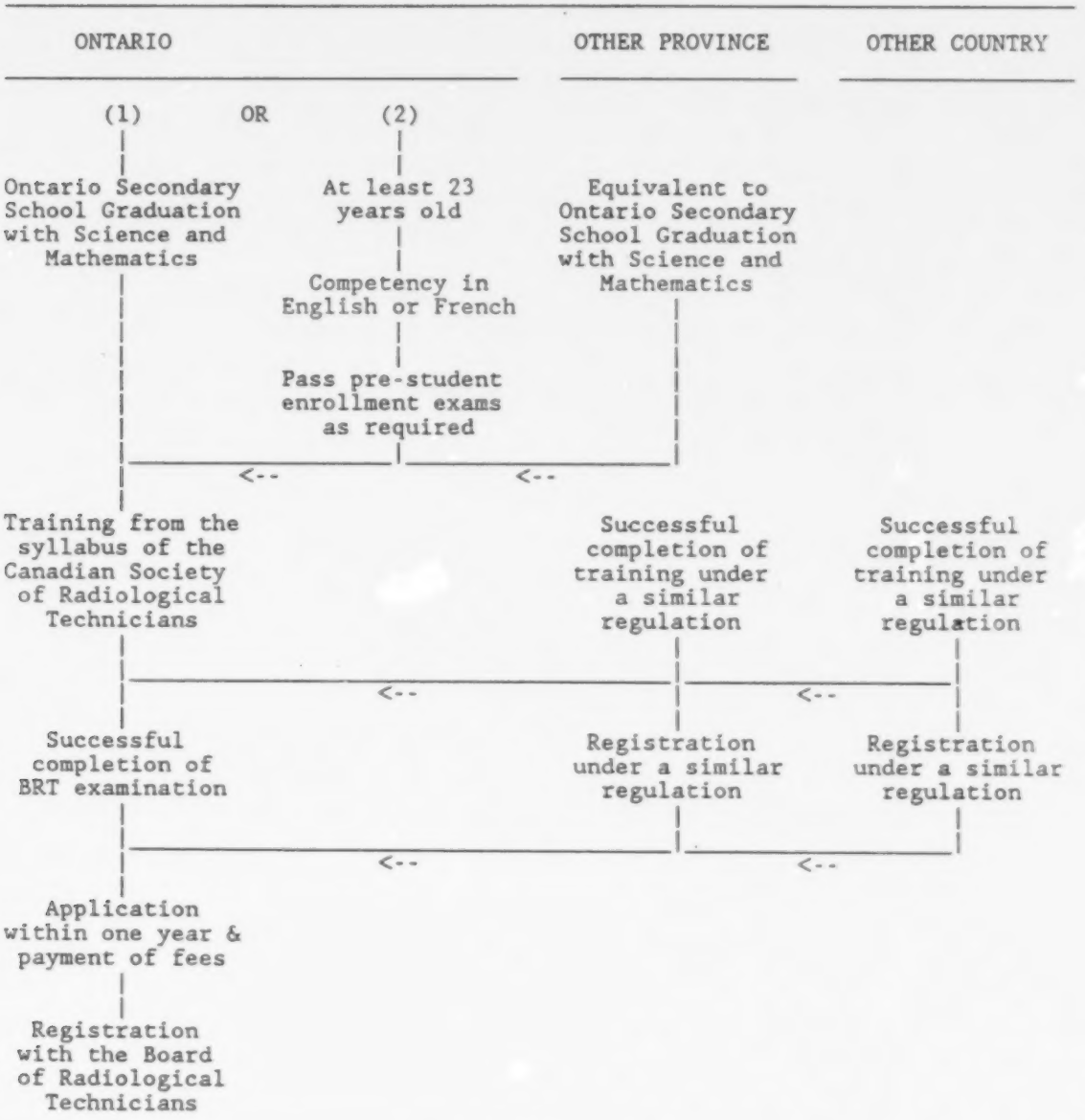
NOTE: "The Board [of Directors of Physiotherapy] does not consider it appropriate for regulatory boards to be using the examination of a professional association. Therefore, we are in the process of designing a National Entrance Examination for both Canadians and non-Canadians, under the auspices of the Canadian Alliance of Physiotherapy Regulatory Boards..." - Rhona Wolpert, Registrar

PROCESS OF ENTRY TO PRACTICE AS A PSYCHOLOGIST IN ONTARIO


ONTARIO
OTHER PROVINCE
OTHER COUNTRY
Doctoral training in psychology at a degree-granting institution in Canada
Doctoral training in psychology at a degree-granting institution in Canada
Doctoral training in psychology at a regionally accredited U.S. university or an approved university in another country
Submission of application, fees, transcripts, and reference forms
Board review
Assessment of work (if necessary)
1 year's supervised experience and Board Examinations
Board review
Registration

NOTE: This chart conveys our interpretation of the relevant Act and Regulations. The Ontario Board of Examiners in Psychology returned this version without comment.

PROCESS OF ENTRY TO PRACTICE AS A RADIOLOGICAL TECHNICIAN IN ONTARIO


ONTARIO
OTHER PROVINCE
OTHER COUNTRY
(1)
OR
(2)
Ontario Secondary School Graduation with Science and Mathematics
At least 23 years old
Competency in English or French
Pass pre-student enrollment exams as required
Equivalent to Ontario Secondary School Graduation with Science and Mathematics
Training from the syllabus of the Canadian Society of Radiological Technicians
Successful completion of training under a similar regulation
Successful completion of training under a similar regulation
Successful completion of BRT examination
Registration under a similar regulation
Registration under a similar regulation
Application within one year & payment of fees
Registration with the Board of Radiological Technicians

NOTE: This chart reflects our understanding of the relevant Act and Regulations. The Board of Radiological Technicians returned this version without comment.

PROCESS OF ENTRY TO PRACTICE AS A VETERINARIAN IN ONTARIO

ONTARIO
OTHER PROVINCE OR USA
OTHER COUNTRY
Graduation from Ontario Veterinary College
Graduation from a veterinary school accredited by the American Veterinary Medical Association
Graduation from a veterinary school listed in the World Directory of Veterinary Schools, published by the World Health Organization
Application within one year of graduation
Score higher than 1.5 standard deviations below the mean on both parts of the national board examination for veterinary medical licensing of the NBE Committe of the AVMA, including the "clinical competency" test
Score higher than 1.5 standard deviations below the mean on both parts of the national board examination for veterinary medical licensing of the NBE Committee of the AVMA, including the "clinical competency" test
Successful competion of the clinical proficiency examination of the CVMA
<--
Successful completion of an approved examination on reportable diseases, ethics, jurisprudence and other matters relevant to practice in Ontario
Submission in person of original diploma in veterinary medicine
<--
Canadian citizenship or permanent resident status
Demonstrated proficiency in English or French
Payment of fees for application, examination and registration
Registration as a member of the Ontario Veterinary Association

# APPENDIX E

# LETTERS SENT TO PROFESSIONAL ORGANIZATIONS

February 16, 1987

Dear ,

**Re: Study of Minority Group Access to Professions and Trades in Ontario**

You will have recently received a letter (dated January 19) on this topic from Ian Scott, Chairman of the Cabinet Committee on Race Relations. The letter describes a study that Abt Associates has been engaged to conduct. Mr. Scott's letter was sent, as is this one, to several professional organizations in Ontario.

We now seek your cooperation in conducting the study in question. We have already contacted and met with representatives of some organizations. They have provided us with valuable detail about admissions or qualification procedures. But we want to get at least some summary information from as many professional organizations as possible, based on the following two tasks.

First, we would ask you to review our descriptions of the processes leading to registration, licensure, etc. within your profession. These descriptions come from the published consolidations of Acts and Regulations. They may not convey the full process, involving your organization's interpretation and actual practice of the regulatory procedures. We are now in the process of preparing the descriptions and plan to send them for comment within the next two weeks. Please revise and expand our descriptions as you see fit. The study will benefit greatly from your input, which should not require a great deal of time.

Second, we would like to gather some statistics. If it is at all possible, we would like you to provide the following numbers. (Please note that we need these numbers from everyone, even if we have already met with you about more detailed data collection.)

.../2

| | Received professional training in: Ontario | Other Province | Other Country |
|---|---|---|---|
| A. Number of current members | | | |
| B. Number admitted[1] in most recent calendar year available | | | |
| C. Number who applied for admission[2] | | | |
| D. Number who enquired[2] without formal application | | | |

Notes:

1. Admission means membership in your organization, registration or licensure to practice, etc.
2. This number should account as nearly as possible for all the applicants or enquirers in the calendar year during which most of the people counted under B applied.

We thank you very much for your cooperation. We will send our process descriptions to you as soon as they are ready. Please send your statistical summaries as soon as possible to the address on this letter. If you have any questions about what we require, please contact me directly.

Yours truly,

**ABT ASSOCIATES OF CANADA**

Frank Eaton
Senior Research Consultant

FE:ed

Miss J. Martin
Registrar
Board of Radiological Technicians
P.O. Box 1091, Station 'B'
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N6C 5K2

Mr. W. J. Arnsby
Registrar
Governing Board of Dental Technicians
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Scarborough, Ontario
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Mr. S. W. Stolarski
Executive Secretary
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# APPENDIX F

## DETAILS OF DATA COLLECTED ON TRADES

## DETAILS OF DATA COLLECTED ON TRADES

We obtained detailed data on the process of obtaining the Certificate of Qualification from files at the Ministry of Skills Development. The files on Certificate of Qualification applicants do not bear any identifier other than Social Insurance Number. Therefore, the only group of immigrants we could readily select were the non-landed immigrants, as they are all assigned Social Insurance Numbers beginning with 9. We found records on 141 applicants in this category, with attributes as shown in Exhibits F-1 to F-3.

We considered the number of failures of the Certificate of Qualification exam and the time from application to Certificate of Qualification award. We examined these measures relative to the various categories shown in the exhibits, first for all trades combined and then for each of the four major trades represented in the data. The only significant finding was that, for both hairdressers and hairstylists, applicants in their thirties had significantly more failures. Both older and younger applicants in these trades seemed to have had an easier time of the exams.

The above information does not reveal any serious barriers of particular concern to foreign-trained tradespeople. We must remember that the data represent only non-landed immigrants, many of whom would already have jobs when they arrive in Canada. Therefore, the results shown here must be severely discounted.

Given the questions raised above, we recommend further study, including data on the permanent resident population applying for the Certificate of Qualification, as well as on domestically trained applicants. Such a study would provide a comparison of the difficulties encountered in acquiring the Certificate of Qualification.

NON-LANDED IMMIGRANT APPLICANTS FOR THE CERTIFICATE OF QUALIFICATION

EXHIBIT F-1 Gender by trade

| | TRADE | | | | | Total |
|---|---|---|---|---|---|---|
| | Electrician | MV Mechanic | Hairdresser | Hairstylist | Other | |
| GENDER | | | | | | |
| Male | 11 | 33 | 7 | 4 | 33 | 88 |
| Female | | 1 | 31 | 19 | 2 | 53 |
| Total | 11 | 34 | 38 | 23 | 35 | 141 |

EXHIBIT F-2 Age by trade and gender

Male

| | TRADE | | | | | Total |
|---|---|---|---|---|---|---|
| | Electrician | MV Mechanic | Hairdresser | Hairstylist | Other | |
| AGE GROUP | | | | | | |
| <29 | 1 | 9 | 2 | 3 | 6 | 21 |
| 30-34 | 3 | 11 | 4 | 1 | 9 | 28 |
| 35-39 | 4 | 6 | | | 12 | 22 |
| 40+ | 3 | 7 | 1 | | 6 | 17 |
| Total | 11 | 33 | 7 | 4 | 33 | 88 |

Female

| | TRADE | | | | | Total |
|---|---|---|---|---|---|---|
| | Electrician | MV Mechanic | Hairdresser | Hairstylist | Other | |
| AGE GROUP | | | | | | |
| <29 | | | 11 | 10 | | 21 |
| 30-34 | | | 9 | 2 | 1 | 12 |
| 35-39 | | 1 | 5 | 5 | 1 | 12 |
| 40+ | | | 6 | 2 | | 8 |
| Total | | 1 | 31 | 19 | 2 | 53 |

NON-LANDED IMMIGRANT APPLICANTS FOR THE CERTIFICATE OF QUALIFICATION

EXHIBIT F-3 Country of training by trade and gender

Male

| | TRADE | | | | | Total |
|---|---|---|---|---|---|---|
| | Electrician | MV Mechanic | Hairdresser | Hairstylist | Other | |
| COUNTRY | | | | | | |
| U.K. | 2 | 5 | 1 | | 8 | 16 |
| U.S. | 1 | 1 | 2 | 1 | 3 | 8 |
| Guyana | 3 | 4 | | | 6 | 13 |
| Poland | 2 | 2 | 1 | | 4 | 9 |
| Iran | | 2 | | | 2 | 4 |
| Japan | | 5 | | | | 5 |
| Other | 3 | 13 | 3 | 3 | 8 | 30 |
| Total | 11 | 32 | 7 | 4 | 31 | 85 |

Female

| | TRADE | | | | Total |
|---|---|---|---|---|---|
| | Electrician | MV Mechanic | Hairdresser | Hairstylist | Other | |
| COUNTRY | | | | | | |
| U.K. | 1 | 5 | 2 | | | 8 |
| U.S. | | 6 | 3 | | | 9 |
| Guyana | | 2 | 1 | | | 3 |
| Poland | | 4 | | | | 4 |
| Iran | | 1 | | | | 1 |
| Japan | | | | | | |
| Other | | 12 | 11 | 2 | | 25 |
| Total | 1 | 30 | 17 | 2 | | 50 |